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November 28, 2023

Via Certified Mail Return Receipt Requested

United States Department of Justice
The Honorable Michael E. Horowitz, Inspector General
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530

Re: Whistleblower Complaint by John F. Moynihan

Dear Mr. Horowitz:

Enclosed with this letter is a whistleblower complaint being filed by my client, John F. Moynihan. Copies of this complaint are also being sent to the Inspector General of the United States Department of State, the Inspector General of the Central Intelligence Agency, the Office of Inspector General of the Intelligence Community, and the Office of Professional Responsibility of the United States Department of Justice.

Mr. Moynihan, a former employee of the U.S. Drug Enforcement Administration, is a recognized expert in the areas of money laundering and financial investigations. This complaint is a result of his investigation into the allegations contained therein. As stated in the complaint, your office (and the offices of those copied herein) is most suited to further the investigation into the claims of the affiants as compiled by Mr. Moynihan.

Please contact me with any questions.

Very truly yours,

COMPASS LAW PARTNERS

Brian R. Della Rocca

Encl.

cc: Inspector General, U.S. Department of State
Inspector General, Central Intelligence Agency
Inspector General, Intelligence Community
Office of Professional Responsibility, U.S. Department of Justice

WHISTLEBLOWER COMPLAINT

Submitted by: John Francis Moynihan
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I. INTRODUCTION

My name is John Francis Moynihan. I am a former employee of the Drug Enforcement Administration ("DEA") and am currently a consultant to the DEA and other United States law enforcement agencies. I have thirty-five years experience investigating domestic and international money laundering cases in both criminal and civil matters. The cases I have worked on involve complex domestic and international financial transactions and have resulted in indictments, plea agreements, criminal convictions, large scale seizures of money, and settlements in the billions of dollars. I continue to assist the Department of Justice and the Treasury Department in money laundering and other cases, some of which are currently ongoing.[1] All of which is to say that I am a recognized expert in the areas of money laundering and financial investigations.

This whistleblower complaint is being filed as a result of being approached by a decorated DEA colleague (now retired) with information he received from a long-time confidential informant he knew from his time as an active DEA agent. This colleague served as the DEA Country Attaché in an allied European country conducting drug and money laundering investigations throughout Europe. In that role, he developed a number of cooperating witnesses

[1] I currently run my own global consulting company focused on anti-money laundering efforts and am contracted to work with current case agents at D.E.A., H.S.I. and the F.B.I. on matters involving money laundering. I have an MBA from Old Dominion University and a bachelor's degree in economics from the College of Holy Cross.

and confidential informants as part of the ongoing case work done during his employment with the DEA.

After reviewing the information received from my former colleague and speaking with witnesses, I feel it is my obligation as a former employee of the D.E.A. and current contractor to ongoing agency cases that this information be reported to you.

An attached Table of Exhibits is included herewith for your convenience and is incorporated by reference herein.

II. SUMMARY OF ALLEGATIONS

As detailed herein, I have spoken with multiple witnesses deemed to be reliable each of whom have first-hand knowledge of an alleged extortion ring set up within the Kosovo Specialist Chambers, a European Union initiative ratified by Kosovo's parliament in 2016 to prosecute war crimes. The witnesses have signed affidavits attesting to the facts outlined herein.

The declarations name Mr. Jack Smith, Esquire ("Smith") as an active participant in a scheme that extorted millions of dollars from wealthy individuals targeted for investigation and/or prosecution by the Kosovo Specialist Prosecutor's Office ("SPO"). Smith served as the Specialist Prosecutor from May 7, 2018, to November 18, 2022, at which time he was appointed by U.S. Attorney General Merrick B. Garland to serve as the Special Counsel to investigate former President Trump pursuant to Order No. 5559-2022.

The evidence compiled also includes a tape-recorded interview conducted on April 22, 2022, by Alan Tieger, Esquire ("Tieger") assigned to the SPO working under Smith. Like Smith, Tieger is also a former U.S. federal prosecutor. Significantly, on that tape, Tieger identifies three sets of data that can be obtained by your office:

1. Tieger states he is recording the April 22, 2022, interview. Thus, that recording, and any associated written communications by members of the SPO about statements made during that interview, can be obtained by your office.

2. Tieger identifies the declarant, Halit Sahitaj, as having the "reference code W04370." In my experience, such a designation for a confidential source is only given to *credible* confidential sources. There should be a completed vetting file on this witness that can be obtained by your office as well as internal written communications related to the witness's reference code.

3. Teiger states that he is "reading from a transcript" of an interview of Halit Sahitaj conducted on October 1, 2020, by SPO prosecutor David Harbach, also a former U.S. federal prosecutor. Thus, that transcript and any related written communications by members of the SPO about statements made during that interview can be obtained by your office.

In addition to the information outlined above, three other witnesses have provided affidavits based on personal knowledge regarding this extortion scheme.

Two of these declarants are a husband and wife who are recognized journalists working in Albania and Kosovo. They have worked for major news organizations including the BBC, Sky News, and CNN. Significantly, the husband in his declaration also identified Charles McGonigal ("McGonigal"), a 22-year veteran of the FBI and former head of counterintelligence for the FBI's New York field office, as having met with members of this extortion ring in a restaurant in Tirana, Albania during the relevant time periods. McGonigal recently accepted plea deals by federal prosecutors in New York and Washington, DC. The criminal violations McGonigal pled guilty to related to: (1) payments he received from a sanctioned Russian oligarch after he retired; and (2) concealing hundreds of thousands of dollars he received from a former employee of an Albanian intelligence agency, Agron Neza, while McGonigal was employed at the FBI.

The affidavits made by the witnesses in this matter are based on personal knowledge. All of these witnesses have stated that they are willing to appear in person and give additional sworn testimony in any future proceedings. For all of the above reasons, this matter is being reported to you for review. The affidavits are attached as **Exhibits A through D**. The transcript of the

tape-recorded interview of Halit by Tieger is attached as **Exhibit E**. The recording of the Tieger Interview is available upon request. Also attached as **Exhibits F through J** are images of meetings between individuals named herein and text message chains.

III. PARTIES

1. Kosovo Specialist Chambers and Specialist Prosecutor's Office

The Kosovo Specialist Chambers and Specialist Prosecutor's Office ("KSC/SPO") were established pursuant to an international agreement ratified by the Kosovo Assembly, the passage of a constitutional amendment, and the enactment of the law on Kosovo Specialist Chambers and Specialist Prosecutor's Office. The KSC/SPO are of temporary nature with a specific mandate and jurisdiction over crimes against humanity, war crimes, and other crimes pursuant to Kosovo law, which were commenced or committed in Kosovo between January 1, 1998, and December 31, 2000, by or against citizens of Kosovo or the Federal Republic of Yugoslavia. The KSC/SPO have a seat in The Hague, the Netherlands. Their staff is international, as are the Judges, the Specialist Prosecutor, and the Registrar.

The first Chief Specialist Prosecutor was a former U.S. federal prosecutor, David Schwendiman ("Schwendiman"), who served in that role from September 1, 2016, through March 31, 2018. Smith replaced Schwendiman as the Chief Specialist Prosecutor on or about May 7, 2018, and served in that role until November 18, 2022. David Harbach ("Harbach"), another former U.S. federal prosecutor who had previously worked with Smith, served as a prosecutor at the SPO from 2019 through November 2021. Tieger was at the SPO at all relevant times and remains there as of this date.

2. Sworn Affiants

The four witnesses whose affidavits are attached hereto are:

- **Milaim Zeka ("Zeka")**: husband of Edlira Qefalija and a well-known journalist in Kosovo. Zeka testified that he has worked in the news business since 1986 including for the Swedish Radio Television and Scandinavian newspapers, BBC, Sky News, ITN, CNN, and other "world known newspapers." As a reporter, Zeka also described how he investigated organized crime in Kosovo. Affidavit attached as **Exhibit A**.

- **Edlira Qefalija ("Edlira")**: wife of Milaim Zeka and also a well-known journalist in Kosovo. Edlira testified that she worked in Albania as a journalist starting from 1998 up to 2005 when she was chief editor of News for TV Alsat. When she moved to Kosovo, she continued working as a journalist for RTK and other media with her husband. Affidavit attached as **Exhibit B**.

- **Halit Sahitaj ("Halit")**: a wealthy businessman in Spain to whom the SPO assigned the reference code W04370. As described above, Halit gave recorded interviews to Harbach on or about October 1, 2020, and Tieger, on April 22, 2022. Affidavit attached as **Exhibit C**. Transcript of interview by Alan Tieger attached as **Exhibit E**. ***Identified in Darko's affidavit***.

- **Darko Perovic ("Darko")**: a citizen of Montenegro and close confidant of both Milo Djukanovic, the former President of Montenegro, and Zoran Lazovic, the former head of the Montenegro Special Anti-Crime Unit. Affidavit attached as **Exhibit D**. ***Identified in Halit's affidavit***.

3. Individuals Identified in Affidavits

- **Jack Smith:** Former U.S. prosecutor who served as Chief Specialist Prosecutor at the SPO between May 7, 2018, and November 18, 2022, who is currently serving as the Special Counsel to investigate former President Trump pursuant to Order No. 5559-2022. ***Identified in all Exhibits***.

- **David Harbach:** DOJ attorney who is currently serving on Smith's team to investigate former President Trump. Worked at the SPO under Smith from 2019 to November 2021. Prior to working for the SPO Harbach worked with Smith on the prosecution of Virginia Governor Bob McDonnell. ***Identified in Halit's affidavit and in interview transcript***.

- **Alan Tieger:** Former U.S. prosecutor and current SPO Senior Prosecutor. ***Identified in Halit's affidavit and interview***.

- **<u>David Schwendiman:</u>** Former U.S. prosecutor who served as the Chief Specialist Prosecutor at the SPO between September 1, 2016, and March 31, 2018. ***<u>Identified in Zeka's affidavit and Edlira's affidavit</u>***.

- **<u>Faik Imeri (also known as Florian)</u>:** According to Halit, Imeri represented himself as working with Jack Smith and the CIA. Halit provided a photograph of Imeri's driver's license below. ***<u>Identified in all Exhibits</u>***.

- **<u>President Hashim Thaci</u>**: Former president of Kosovo who was indicted for war crimes by the SPO in April 2020. ***<u>Identified in Halit's affidavit</u>***.

- **<u>Agron Neza</u>:** ***<u>Identified in Zeka's affidavit and Edlira's affidavit</u>***.

- **<u>Charles McGonigal</u>:** Former Special Agent in Charge of Counterintelligence in the New York City Field Office of the FBI. An owner of an Albanian corporation listed as "Law Office & Investigation" with Mark Rossini, another former FBI agent whose law enforcement career ended after he pleaded guilty to illegally accessing FBI files in 2007 on behalf of his girlfriend. According to a press release dated August 15, 2023, from the Office of Public Affairs at the U.S. Department of Justice, McGonigal pled guilty to conspiring to violate the International Emergency Economic Powers Act (IEEPA) and to commit money laundering in connection with his 2021 agreement to provide services to Oleg Deripaska, a sanctioned Russian oligarch. According to the press release, in accordance with an agreement reached with federal prosecutors, McGonigal pleaded guilty to conspiracy to violate the IEEPA and to commit money laundering. McGonigal admitted to performing research about Vladimir Potanin for Deripaska. Potanin is a rival of Deripaska and the research was being done in an attempt to get Potanin added to U.S. "blacklists." McGonigal also admitted to accepting—and concealing—a $17,500 payment from Deripaska in 2021 knowing that the payment violated sanctions the U.S. had placed on the oligarch in 2018. Prosecutors agreed to drop other charges against McGonigal stemming from his collusion with Deripaska to violate U.S. sanctions. On September 22, 2023, McGonigal pleaded guilty to accepting $225,000 from Albanian-American Agron Neza, a former Albanian intelligence officer who McGonigal admitted was

helping him foster relationships in Albania to help lay the groundwork for future business opportunities in the country. ***Identified in Zeka's affidavit and Edlira's affidavit***.

- **Hillary Clinton:** Former U.S. First Lady, U.S. Senator from NY, and U.S. Secretary of State. Reference to Smith allegedly asking if Potanin still held evidence of corruption by Hillary Clinton. ***Identified in Halit's affidavit***.

- **Florim Alaj:** Under current indictment in Pristina, Kosovo for "breaking into computer systems", "self-judgment" and "misuse of trust". Alaj is the alleged recipient of two separate transfers of crypto currency to wallets he controls. The total value of the transfers is said to equal $16 million in crypto currency. Alaj is the franchise holder of Bitcoin ATM machines in Kosovo. Current research points to Alaj having a cyber security firm and pornography business as well. While performing research on Alaj, he was located in Zug, Switzerland. He was contacted by telephone and claimed to be out of Switzerland at the time. He was not. Alaj called the contact number back and stated, "I know I have problems with Americans but I'm not sure to meet at this time." Subsequently, he refused to meet to discuss the current events of this matter. ***Identified in Halit's affidavit***.

- **Vladimir Potanin:** Russian oligarch and rival of Oleg Deripaska. ***Identified in Halit's affidavit***.

- **Michail Prochorov:** Russian oligarch. ***Identified in Halit's affidavit***.

IV. SUMMARY OF AFFIDAVITS

1. Zeka

Zeka, born in Kosovo but now a citizen of Sweden, is a journalist. Zeka has signed a sworn affidavit of his interactions with the members of the SPO, including Smith and Schwendiman, as well as with Imeri, McGonigal, Neza, and former investigators involved with the European Union Rule of Law Mission in Kosovo ("known as "EULEX"). The affidavit recounts incidents of the prosecutors at the SPO extorting wealthy individuals in exchange for (1) not being indicted; or (2) not having their names added to the list of indictments.

In the affidavit, Zeka names individuals who were present at meetings. Zeka's identification of these individuals will enable verification of his story. Further information is available upon request.

Zeka's Affidavit is attached as **Exhibit A**.

2. Edlira (Zeka's Wife)

Edlira, born in Albania, now a citizen of Sweden and, as described above, Zeka's wife, is also a journalist. Her affidavit confirms the information outlined in Zeka's affidavit and adds her own narrative to the scenario. Her affidavit also outlines her interactions with alleged CIA agent, Imeri, and her personal knowledge of instances where the SPO allegedly extorted individuals in exchange for special treatment.

Edlira's Affidavit is attached as **Exhibit B**.

3. Halit

Halit, born in Kosovo and living in Spain, is an SPO witness who was assigned the number W04370. His affidavit outlines numerous interactions with Imeri, Jack Smith, Russian oligarchs, friends and family of Kosovo President Thaci, and others. Halit discusses being induced into doing the bidding of the Specialist Prosecutors office to extort Russian oligarchs and the family and friends of Thaci in exchange for leniency. Specifically, Imeri directed Halit to find Russian oligarchs who are on the U.S. sanction list so they could offer "assistance" to get them off the list or, for those oligarchs who were not on the list, to keep them off.

Imeri told Halit that the Russian oligarchs would have to (1) sign a contract to work for the "[Central Intelligence] Agency" and provide information about Vladimir Putin, and (2) pay money into a "black fund for operational expenses."

Halit also outlines a question by Jack Smith about whether Vladimir Potanin is "still in possession of evidence of corruption by Hillary Clinton." Smith was wondering if Halit knew if Potanin shared the evidence with anyone in the "Secret Service." What does Smith know about Potanin and Hillary Clinton and how does he have this information? In the end, Halit heard through an intermediary that Potanin paid €9 million to the "black funds."

Halit spoke with Michail Prochorov with an offer to get him off the sanction list or to keep him off. He could not recall whether, at that time, Prochorov was already on the list. From what Halit understood, the meeting was successful. Halit heard through an intermediary that Prochorov has paid €7 million to the "black funds."

When Halit pushed back, Imeri countered saying that he knew "where [Halit] works and [Imeri] could easily destroy [Halit's] life, [his] family, and everything [Halit] had ever worked for."

Halit was coached by Smith and his staff to testify to certain information. When asked how he knew all of the information he provided since he did not live in Kosovo, Halit used Smith's name as a way to change the subject. Halit maintained a blue notebook with his notes about how to testify when he was being coached by Smith and his staff. Images of pages from the blue notebook are attached as **Exhibit K**.

Halit's affidavit contains numerous allegations that can be investigated by your office. Halit's affidavit is attached as **Exhibit C**. The transcript of Halit's interview with Alan Tieger is attached as **Exhibit E**. The recording of the interview is available upon request.

4. Darko

Darko, a citizen of Montenegro who currently resides in Spain, was introduced to the SPO's scheme through Halit. Darko was told that the SPO, particularly Jack Smith, was "focused

on cleaning up corruption in Kosovo and the region including Montenegro." He was told that the SPO had a list of 16 people from Montenegro that "he wanted to investigate and possibly arrest." Smith wanted Darko to send a message to Montenegro President Djukanovic, a close friend of Darko, and to Police Commander Zoran Lazovic,[2] also a friend of Darko.

When Darko discussed the request with Imeri, Imeri told Darko that the SPO was investigating corruption in Montenegro "to clear the road for Montenegro to become a full member of the European Union." Imeri also told Darko that his friend, Lazovic, was on the list of 16 people under suspicion.

At Imeri's request, Darko set up a meeting between Lazovic and Imeri in Switzerland which occurred on February 11, 2021, at the Park Hyatt Hotel in Zurich. During that meeting, Imeri and a prosecutor from the SPO asked Lazovic if he and President Djukanovic would testify in their case against Kosovo President Thaci. Lazovic allegedly responded that he could not speak on behalf of President Djukanovic but that he did not know anything about Thaci.

A short time after the meeting, Imeri told Darko that "his office and Prosecutor Jack Smith's office believe Montenegro should not be punished, and that the U.S. wanted to help clean up the corruption." Imeri continued by saying that "some people would need to be arrested" and that the "program would take 3-5 years." Imeri then wrote down the number, "$100,000,000." Darko understood Imeri to be indicating that, in exchange for the payment of $100 million, Smith would refrain from indicting Djukanovic and Lazovic.

Darko's affidavit contains numerous allegations that can be investigated by your office. Darko's affidavit is attached as **Exhibit D**.

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[2] Lazovic was dismissed as senior police officer of organized crime and corruption by the Montenegrin government in March 2021.

V. CONCLUSIONS

All affidavits point to Imeri as being the messenger between the affiants and whoever was directing the alleged extortion scheme. Each affiant discusses the SPO and Smith's involvement and some discuss other Prosecutors from the SPO. Some affiants even mention direct contact with Smith.

The affidavits paint an elaborate picture of an alleged extortion scheme where those who committed war crimes were able to pay Prosecutors at the SPO for a get out of jail free card. Other alleged extortion schemes involved simply finding wealthy individuals who were not accused of any war crimes and requiring them to pay to keep their names off the list as war criminals.

The similarity of the events outlined in the affidavits and the parties mentioned in the affidavits raise numerous questions. First, it must be established whether Imeri (at the time he was making threats and demanding payoffs) was indeed working with the SPO and, more specifically, with Jack Smith, as he repeatedly claimed. Additionally, is Imeri, in fact, an operative or agent of the Central Intelligence Agency? If Imeri is with the CIA, was he acting in his capacity as an operative or agent of the CIA when meeting with the affiants?

As mentioned above, what does Smith know about "evidence of corruption" by Hillary Clinton? When and how did Smith learn of this information? What did Smith do with this information? Is it being investigated? Why did Smith ask Potanin this question?

Does Smith know Florim Alaj, the holder of the cryptocurrency wallets with Potanin's and Prochorov's payments? How does Smith know Alaj? Did Smith interact with Alaj?

Did Smith ever meet with disgraced FBI Agent McGonigal? If so, where, when, and for what purpose? Did Smith know McGonigal was interacting with SPO staff?

All of these unanswered questions coupled with the allegations contained in the affidavits warrant an investigation by the United States government.

In conclusion, finding myself in possession of these serious allegations and being unable to investigate or corroborate them further, I bring this information to your attention because your office has access to the information, the ability to obtain additional information, and the authority to investigate this matter. The affiants are available to discuss their claims with you at your request. Further information will also be provided, upon request. All communications should be through my attorney who is submitting this complaint on my behalf.

VI. SWORN STATEMENT

I declare, under penalties of perjury, that the foregoing is true and correct to the best of my knowledge and belief.

Dated: November 28, 2023

John F. Moynihan

TABLE OF EXHIBITS

Exhibit A. Affidavit of Milaim Zeka

Exhibit B. Affidavit of Edlira Qefalija

Exhibit C. Affidavit of Halit Sahitaj

Exhibit D. Affidavit of Darko Perovic

Exhibit E. Transcript of recorded interview of Halit Sahitaj by Alan Tieger (audio recording available upon request)

Exhibit F. Image of Agron Neza (pictured left) with former FBI Agent Charles McGonigal (center) (the other individual in picture is not known)

Exhibit G. Faik Imeri's safehouse located at Naamsesteenweg 581, 3001, Leuven, Belgium

Exhibit H. Text chain discussing former FBI Agent Charles McGonigal and his business partner, former FBI Agent Mark Rossini

Exhibit I. Text chains discussing Agron Neza, Jack Smith, McGonigal, Imeri, and David Schwendiman.

Exhibit J. Text chains mentioning Jack Smith

Exhibit K. Images of pages in blue notebook maintained by Halit Sahitaj when asked to testify falsely on October 1, 2020 (referenced in Exhibit E).

EXHIBIT A

Place : Pristina, Kosovo

Date: September 26, 2023

Statement for the American Congress

(not to be disclosed with media)

Me the undersigned Milaim Zeka, born on October 25, 1962 in Kosovo, and Swedish citizen with my personal number 6221025-2794 working as a Journalist am giving this statement in my free will.

I have worked starting from 1986 up to 2001 for the Swedish Radio Television and Scandinavian newspapers. During the war in Kosovo, I have cooperated with BBC, Sky News, ITN, CNN and for many world known newspapers. Because of my profession and investigation that I made to the organized crime in Kosovo within the international bodies, including American, Italian, german, british, French and Scandinavian police and prosecutors, in 2014 I was arrested by the Eulex police (the EU mission in Kosovo). After 5 years of court proceedings I was found innocent.

The EULEX prosecution office run by the Italian chief of prosecution Mauritzio Salustro, accused me of justice obstruction. At the time I interviewed some witnesses who testified that they were seduced with money, change of identity and change of place of living sending them to live abroad in western countries, ensuring them even permanent papers. Of course to me as Swedish citizen and journalist, these type of methods used to coerce witnesses from EU prosecutors and investigators, were identical to those used by the Soviet Union and in other former communistic countries.

One day, together with my wife and a high EULEX official from Italy, Isaia Guardascione, went to the office of the chief prosecutor of Eulex Salustro. During the conversation with him, he among others, told me: our final goal is not discovering the war crimes in Kosovo, but we wish that through arresting the war leaders to get the illicit money they won after the war. He mentioned by name, Sami Lushtaku very powerful person in Kosovo as in the political, war and business world.

When we went out of the office of the chief prosecutor, I after sending a copy of the illegal recording of the conversation to a colleague of mine, I called another journalist friend to verify my suspicion that EULEX was taping my phone without court permission. To my friend I said that I had the recording of the scandalous conversation with Salustro.

The next day, at 8.00 in the morning tens of civil policeman and special forces of Eulex under masks arrested me and checked my office, my apartment and 2 cars.

In August 2015 the Kosovo Parliament after a huge international pressure, as result of Russian – Serbian lobbing, voted in approval to the special chambers of prosecution that in Kosovo is known as The Special Court of the Hague in Netherlands. The prosecution have unlimited competences without having any checking authority from Kosovo even though legally this court is founded by the Kosovo Parliament. For example, even the Ombudsperson would be sitting in Italy and not in Kosovo. This means that the prosecution would be an institution above any other legal or political institutions in Kosovo.

After some months of the voting in parliament, from an agent of the Swedish military secret services, I got a list with 21 names of political and military leaders of Kosovo as possible names going to be accused by this Court.

Sometime around 2016, a person named Faik Imeri called me. He told me that we should urgently meet because he had a very important information related to my life and my family safety. Faik Imeri came in Kosovo and we met in one restaurant named Bata, 5 km in the outskirts of Prishtina in Gracanica known as a Serbian enclave. Faik introduced himself as a CIA agent and told me that among others he participated in the action when Bin Laden was killed, as well as the arresting action of the Serbian President, Milloshevic. After this introduction he told me that he Idolized me and he grew up as a kid reading and listening my reports and actions against the Serbian country. Afterwards he told me that after the publishing of the list with names, the President of Kosovo, Hashim Thaqi, the speaker of Parliament Kadri Veseli and the war General Sami Lushtaku were preparing an attack against me.

The next day, we decided to meet again in Brezovica in another Serbian restaurant. When I went at the meeting I see that Faik was guarded by Kosovo police officers dressed civilian, and I was even more convinced that he was really part of some American secret Services. But later in life, I understood that a friend of his, named Astrit Krasniqi who is a owner of many gambling houses, paid these police officers with his own money.

Faik proposed me that after getting dark, he would come at my home, together with a female agent and would show me a very important document. Sometime after 22.00 local time, he came at my home, and in presence of my wife and kids he showed me from his lap top a document entitled Top Secret. This document was showing how the Special Court was created under the pressure and sponsorship of Russia, Serbia and their western allies. He told me that this document has a value of 100 million of Dollars, because if it gets out, then the whole special court will be demised.

After these meetings in Kosovo, me and Faik Imeri talked through the phone several times per day. In order for him to convince me on the importance of himself, he proposed for me to travel in Brussels where I would meet with the chief prosecutor of the Special Court, the American citizen David Schvedeman.

I traveled from Kosovo to Duseldorf by plane. At the Duseldorf Airport, Faik waited for me and we traveled by car to Brussels. The next day he came and got me from the Hotel together with

a lady who was introduced to me as CIA agent and by car we went in a small city some 80-100 km away from Brussels. This city was controlled by camera. We went in a parking slot where 2 investigators from the Special Prosecution were waiting for me. One of the investigators was a Slovenian citizen named Jure Peter who worked in Kosovo for EULEX and an old acquainted of mine. The other person was e Belgian citizen a former EULEX police. I knew both of them. We went in a hotel and met with the Chief Prosecutor of Special Court David Schvedeman, from USA. The head of security of the chief prosecutor was a Swedish citizen. The arrangement of the meeting was done by Faik Imeri and he stayed only for 10 minutes at the start of the meeting. Then I continued the meeting only with Schvedeman staff and himself.

After I came back from the meeting with the chief prosecutor, Faik always speaking on behalf of the Special Prosecutor and Court, told me that they helped other people as well, asked from me to meet him with people seeking justice. I gave the contact of Faton Ramadani who was seeking justice for his brothers convicted on crimes they didn't commit.

During the conversations with Faik, he told me among other, that the historical chance came to get money from the President Thaci, who, according to Faik had 400 million of Euros in Austrian Banks under his son name, and told me that Faik would get huge amounts of money from Thaqi being that these money were originating from the people of Kosovo. According Faik, his brother Imer Imeri, took from the President 1.5 million of Euros, with the condition not to witness against the president in the court. Faik Imeri declared to me that on behalf of Jack Smith and Special Prosecution required to a well know businessman in Kosovo named Blerim Devolli to pay 10 million Euro if he wanted to be free of charges regarding obstruction to justice.

During the time when I communicated with Faik Imeri, he sent me lists with initials of people who supposing would be arrested, as well as part of testimonies gathered in the special prosecution of the President Thaqi. He showed me how many times the President was interviewed by the special prosecution. Faik Imeri had information that the President Thaqi would face charges from Jack Smith in order to sabotage the meeting in the White House where the agreement of peace among Thaqi and the President Vuqiq would be signed in the presence of President Trump. According Faik Imeri, the main actors of the charges against Thaqi were Jack Smith, the German Chancelor Merkel and the Prime minister of UK Boris Johnson.

As a journalist I had my suspicions of the information he was sharing, and best part of these information I referred to the President Thaqi previous his travel to Washington without telling him that the source was Faik Imeri, but always saying that a person introduced himself as CIA shared such information, since Faik introduced himself as CIA agent to me.

When Thaqi traveled to Washington, right after he landed in the transit country, he came to know that the charges were pressed officially and the whole process and meeting with the USA President and the peace agreement with Serbia was jeopardized and became null.

Because I had my own continuous suspicions and informations that I got from different other people that Faik Imeri de facto was a member of the Serbian Secret Services, I continuously tried to verify if this person was really a CIA agent or not.

One day in Tirana I had lunch with my wife, and the owner of the Austrian insurance company Sigal, Mr. Avni Ponari and Agron Neza. During the lunch a person who I came to know was Charl Mc. Gonigal came at the same restaurant. Agron Neza introduced him to me as being Chief of FBI. Agron introduced himself to many people in Kosovo, Albania and North Macedonia as a FBI operator and his office was in Berlin, Germany. After me myself did see that Agron and Mc Gonigal were really close, I thought that it was my best chance that through Agron I could verify if Faik Imeri was really a CIA agent or not. I sent to Agron a picture of Faik Imeri. I am the author of this picture, and I was the only one having that picture in my files. Agron right after some seconds forwards this picture to Faik Imeri and I am convinced that he forwarded that to Mc Gonigal as well. After some 10 minutes Fak Imeri calls me from Brussels, starting to threaten me and tells me that he and Jack Smith would arrest me because I revealed his identity as part of Special Prosecution staff and as staff of American secret Services. I told Faik that I am a journalist, and care less about Jack Smith, the Special Prosecution or any other services, but Faik on behalf of the above, using different people required from politicians, former KLA members and businessmen in Kosovo millions of euros and blackmailed these people through different files which you did get from Jack Smith and the Serbian Secret Services residing in Belgrade. I told him as well, not to forget that he himself declared that people who brought in Kosovo the secret files originating from the office of Jack Smith, were paid at least 3 million of euros. On publishing these files, 2 people are suffering convictions now in the Special Court.

Faik Imeri, on behalf of the Special Prosecution initially using David Schevedeman and later on behalf of Jack Smith with the huge support of the Serbian secret Services, created a criminal group in Kosovo where as a coordinator of such Group is Astrit Krasniqi, owner of some casinos in North Macedonia and Serbia and Halit Sahitaj who was introduced by Faik as an agent of German Secret services. According Faik Imeri, he organized the stealing of the mobile phone, at his home, of the Chief Prosecutor of Kosovo Aleksander Lumnezi. Lumnezi was afterwards blackmailed as well. In this group another powerful person is Florim Alaj, IT expert living in Switzerland. This group installed secret cameras in different hotels, houses of prosecutors and judges, that afterwards were blackmailed and got huge amounts of money from them.

To me personally and to my family, based on a document produced by the Serbian Secret Services, and delivered as a testimony in the Hague Court during the penal process against the former President of Serbia Slobodan Milloscevic, against the former Prime Minister of Kosovo Rramush Haradinaj, against Fatmir Limaj and Haradin Balaj (former KLA officials) I am accused of participating in different guerilla actions in 1996 and in 1998 by order of Rexhep Selimi (actually in the Special Court facing charges raised by Jack Smith) have committed the crime and killed general Ahmet Krasniqi in Tirana. At both years, in my defense I was working as a regular daily journalist in the Swedish Radio television, which is easily verifiable. The night when

the Minister of Defence Ahmet Krasniqi was killed, I was in Stockholm and I received a phone call from the Prime Minister of Kosovo in Exile Bujar Bukoshi, giving me the information, and the next day it was me who reported this information for the Swedish media.

Faik Imeri with his group through blackmails saying that the Chief Prosecutor Jack Smith will accuse me for usurpation of my house in Pristina, which I bought in 2003, got from me 320 thousand of Euros. These money I gave to his cooperator at the time, Halit Sahitaj.

After many conversation with Halit Sahitaj, at the end I succeeded to raise suspicions that Faik has nothing to do with CIA. Halit started to confess to me as a journalist, shocking facts on how Faik trained Halit and other witnesses, one of which Gani Geci was even paid 70 thousand Euro according Faik, to testify in the Special Court against the President Thaqi and the others. A victim of these schemes as even Halit, that confessed to me that when he gave his first statement, during the pause, a german prosecutor asked Halit: how come you are testifying against these people when everybody knows you didn't live in Kosovo and you know nothing in first person about these people?! Understanding these fraudulence actions, Halit Sahitaj contacted with the special prosecution and on April 22, 2022 he gave a statement to the Prosecutor Alan Tiger in presence of other investigators of the special Prosecution testifying how the High CIA Agent Faik Imeri trained Halit and sent him to give false testimony against the accused people in the Special Court of Hague.

In my file, I attached many copies of sms during the conversation with Faik as well as other sms of conversations of Faik and Faton Ramadani. I can as well offer voice recordings of conversations among the witnesses and Prosecutors in the Hague where Jack Smith is directly involved.

I am astonished as a journalist on how the Special Prosecution in Hague did not open any investigation on such fraudulence actions, even after the publishing of such shocking facts in the media in Kosovo and in Albania. The same can be told regarding the USA embassy, on how no official of them either in Kosovo or Pristina, in my knowledge, took any actions against a person impersonating a CIA agent, American citizen and always speaking on behalf of the American people.

On how Faik Imeri is connected with David Schvedeman and Jack Smith, I am offering a video recording where Faik Imeri himself underlines the fact that he was the intermediary person among potential witnesses and Prosecutors in the Hague. This interview for the Kosovo Local Media was given on February 26, 2020 in T 7 television, the program Pressing with journalist Leonard Kerqyku and Berat Buzhala. After Faik gives his statement for the program, the journalists interview live a witness named Gani Geci, who among others says and I quote: Yes, it is true that Faik Imeri called me by phone and asked me if I wanted to meet with the chief prosecutor Schvedeman. And I answered to Faik that I would be delighted to. Follow the link on : https://www.youtube.com/watch?v=AI4tGYkjitY

As copy of my testimony I am giving you a printed copy of an article published by Faik Imeri himself on January 12, 2020 on the paper Express where he himself states that he is a strong cooperator of the Special Court. Follow the link on: https://www.gazetaexpress.com/vellai-tjeter-i-haki-imerit-akuza-te-renda-ndaj-presidentit-me-ty-hashim-thaci-shihemi-ne-gjykate-speciale-85558/

I am ready to testify on the above at any time and in front of any USA legal institutions.

Milaim ZEKA

EXHIBIT B

Place : Pristina, Kosovo

Date: September 26, 2023

Statement for the American Congress

(not to be disclosed with media)

Me the undersigned Edlira Qefalija, born on June 17, 1979 in Tirana Albania, and Swedish citizen with my personal number 790617-9044 working as a Journalist in Albania and Kosovo am giving this statement in my free will.

I married with Milaim Zeka, and moved in Kosovo on September 05 2005. I have been working in Albania as a journalist starting from 1998 up to 2005 when I was chief editor of News for TV Alsat. When I moved in Kosovo I continued working as a journalist together with my husband for RTK and different other media.

I would like to testify that I am a witness of most conversations between Faik Imeri and my husband. I was at home when Faik first visited us together with a lady who was introduced to us by Faik as a CIA agent. From his lap top Faik showed us a Top Secret document who Faik said was originating from CIA. Faik at the time said that he needed to visit us in order as he said to give us the information that the life of my husband was in danger since according to him President Thaqi together with Kadri Veseli and Sami Lushtaku were organizing an attack toward him, because my husband published a list of potential names to be charged with accusation by the Special Court.

On the other hand, Faik always talking on behalf of David Schvedeman or afterwards on behalf of Jack Smith represented my husband as a main witness of the Special Prosecution, endangering his life on purpose.

Faik Imeri arranged the meeting among my husband and David Schvedeman in Brussels insisting on this meeting, which I did not like.

Faik Imeri was always calling my husband tens of times per day even in non appropriate times, and whenever he could not reach him, he would call me to know his whereabouts.

Sometime later he started to convince my husband that at the office of Jack Smith there reached very hard accusation, according Faik not to be true, and that according to this accusations my husband could be arrested because of one house being bought on 2003. I didn't see any relations between buying the house and the Special Court, but Faik was very insisting that the accusations could sent my husband into prison for at least 10 years during which time he could lose his profession and life, until he would be discharged from the accusation. In order

to clear my husband from this "process" Faik on behalf of Jack Smith asked for 500 thousand Euros, which we did not have. After some negotiations they agreed for 320 thousand of euros. In order to reach these money we asked for a loan from different banks and submitted documents to BKT (Banka Kombetare Tregtare in Kosovo).

Continuously I was against this "bargain" being that in between of the "negotiations" there was an Albanian citizen from Serbia named Ilir Zajmi, a Kosovo Citizen Astrit Krasniqi being owner of some casinos in the Balkans, and another person named Halit Sahitaj, all of which were not convincing me about the whole situation.

We didn't have all the money so Halit loaned us 100 thousand euros. I understood afterwards that it was Halit who actually gave to Faik the whole sum of money.

Afterwards Milaim using his journalistic investigative techniques uncovered that Faik was not a part of CIA even though Faik always introduced himself as such. Milaim published this fact in many Albanian and Kosovo televisions. One of the ways he used to uncover this impersonating of Faik was during a lunch we had in Tirana with the owner of the Austrian insurance company, SIGAL, Avni Ponari. At the lunch, Ponari was together with another person named Agron Nezaj. During lunch time, there comes an American saying Hi to us, who Agron introduced as Chief of FBI, named Charls Mc. Gonigal. We continued our lunch and Milaim asked Agron to verify a person who was introducing himself as a CIA and sent him the picture of Faik Imeri. Not later than 8-10 minutes, Faik calls Milaim shouting and threatening him. Apparently, Agron Nezaj just forwarded that picture to Faik, and Faik was really mad about it. He told Milaim: now you have to face charges from Jack Smith and CIA because you revealed my identity to other people. I said to Agron: what is this game you are playing. If you did know Faik, you could simply say yes or no, and not forward pictures around. Agron didn't reply to me at all and just started laughing thinking it like a game, whilst Faik kept shouting and threatening my husband. I was really upset, and told Milaim that none of the guys, either Faik or Agron were to be trusted and that they are miscreant. Afterwards when I heard that Faik was asking for money on behalf of Jack Smith in order for other people not to face possible charges, my suspicions were confirmed.

When Faik felt that his whole scheme went to smoke, he started to threaten my husband and shaming the whole family. My mother in low is a missing person in the war. Faik had the guts to accuse my husband that he know where his mother is, and opening another nightmare for us. He called me personally many names, which I don't care about, but still I know that he is trying to ruin my reputation in the small country we live in. His war against my husband is continuous with Faik saying that my husband is a key witness in the Special court, endangering his life, even though he himself several times confirmed in the media that he is a liaison person between the Special Court in the Hage and potential witnesses.

Anytime he speaks in the media he speaks as an expert of anti terror, or a special envoy of the Special Court. He keeps introducing himself to everybody as an American citizen, or an agent of

CIA or an agent of American secret services, or as the closest person to Jack Smith, or the key person who can find, regulate, resolve, charge or dismiss charges against anybody he wants.

On all the above I can testify whenever and wherever the legal institutions might call us.

Phd. Cd. MA. Msc. Eng. Edlira Qefalija

Journalist

EXHIBIT C

Statement of Halit Sahitaj

October 3, 2023 Marbella, Spain

I, Halit Sahitaj, Kosovo Personal ID number 1030313441, born on 21 April 1966, make the following statement to the American Government without coercion nor promise of any benefit or reward. I make this statement based on my personal knowledge.

In February 2020, I received a phone call from a male voice who identified himself as an American named "Florian". He spoke in English and said he was a representative of the U.S. State Department. Florian said he had information about me, and I should meet with him to talk. I told him no and hung up the phone.

Four days later, I received a text message from Florian. He said I would be interested in what he has to say and for me to call him. I returned his call. Florian informed me that he works for an American agency, He went on to say that he was aware that I had problems with political corruption in the past in Kosovo. Then he informed me that he had received a special telegram from Kosovo Secret Service "AKI" regarding me. Specifically, Florian said the telegram asked if the Americans were aware that I am possibly a Russian spy. Florian told me that he had checked the U.S. system and he had told the Kosovo AKI that I was not in their system in any way. I told Florian that he should be careful of the people in Kosovo because they may truly be attempting to extort money from me. Florian told me that he can help me out of this situation. We agreed to speak more in the future.

For the next several weeks, we spoke on the phone daily. Sometimes we spoke 3-4 times in one day. During our many phone conversations, Florian said that he would have to speak to both U.S. and Belgian authorities. Florian spoke about his past operations for the American agency to gain my trust and confidence. During one phone call, I finally asked Florian which agency he works for. He told me to turn on the phone's camera to switch to video chat. When I did, he showed me a piece of paper on which he had handwritten, "CIA." He did not say it. He just pointed to the paper. At this time, I was somewhat convinced that Florian was an agent for the CIA.

During this period, COVID-19 was affecting the world and we faced lockdowns and restrictions. Florian and I continued to speak on the telephone daily. Florian was very interested with my business connections in Russia. Though I had no businesses there, I did have some friends in Russia. He wanted to know everything I knew about these people. I gave him all the information I had.

During a phone call in late April or early May of 2020, Florian said, "Okay, I am going to call you from an official phone, and I am going to record the conversation. We will ask you questions about the first wife of Vladimir Putin. You will respond that you and your wife know her, and she lives nearby. You will also say that she and your wife have gone out for drinks and come to your house for pancakes." I did everything as I was instructed. I made the call and told the story that Florian told me to say.

We continued our daily conversations. The main subject remained my Russian connections. When the COVID restrictions were lifted, Florian told me that I would need to travel with him to sign my official contract. He instructed me when and where to meet him. He told me that we would travel in my car to Belgium. He said that they were going to do some modifications to my car for them to always know

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where I am located. He also said that I should bring copies of my wife and son's passports and three watches with me. One watch for me, one for my wife, and one for my son. He said that they were going to modify the watches so that they could be monitored also. Florian told me to bring $10,000 euros for each watch modification, $45,000 for the car modifications, $12,000 for the training course that I was to attend, and wire $6,000 to a colleague in the U.S. to cover the tax expense of the training course. I collected all the money, watches, and identifications to Belgium in late May 2020.

I met Florian at the address he provided. He met me in the parking area. He told me to follow him to the "safehouse." At the time I did not know the location. But I later learned the safehouse is called "De Jacht Herlee." It is located at Naamsesteenweg 581, 3001, Leuven, Belgium. In the safehouse, Florian showed me a badge that said, "Special Agent" and had the initials "CIA" on it. He also showed me pictures of operations in Afghanistan and said he was on the mission that killed Usama bin Laden. He also showed me several pictures of military operations which had the faces blurred and claimed to be in the pictures. After seeing his badge and the photos, I was 100% certain that Florian was a member of the CIA and that I was being recruited to work for them.

During this first visit to the safehouse, I asked, how can I be of service to the CIA? Florian explained that they were very busy working with the tribunal at The Hague. He said they were investigating war crimes in Kosovo and perhaps I could help with that. I agreed. Florian said that he would introduce me to the "Special Prosecutor, Jack Smith" to see exactly how I could help the investigation. For the two hours, we sat in the office speaking about Kosovo, the war, the politics, and the people. At this time, I signed my contract to work for them. I had to complete two forms. I had to provide the names of my parents and other family members. At the top of one form, it said CIA. At the top of the other, it said "SIU." I was told that means Sweden, Italy, and United States. At this time, we ended our meeting in the safehouse.

Over the next four weeks, we continued our daily conversations. He told me every day how bad the people of Kosovo are. We became good friends, and I trusted him completely.

At the end of June 2020, Florian knew that I had to attend business in Switzerland. He told me that if I had time, I should come to Belgium to see him as well. I traveled to Belgium after my business in Switzerland and met with Florian. Florian asked if I know, Valeri Subbotin, a Russian working for Lukoil. I answered that I know him and asked if something was wrong with him. Florian said that the Agency knows that this gentleman was working for the Russian GRU. Further, they used the structure of his company to work against the Spanish government mostly supporting the Spanish region called Catalunia for their independence from Spain. Florian explained that the Agency needs to make a relationship with Subbotin but they have their own ways. He said that he would give me documents to deliver to Subbotin that say he has trouble in Spain. Florian told me to strengthen my relationship with Subbotin. Florian told me the goal is to scare Subbotin and hopefully he would ask for help. I was told that if he asks for help, to arrange a meeting between Subbotin and Florian. During this conversation, Florian received a phone call. He held the phone for me to see and the display said "Jack Smith" and it had a picture of justice scales for the contact photograph. Florian answered and said, "Hello sir, I am with our new man from Spain." Florian put the phone on speaker and a male voice in perfect English said, "Hello, it is nice to meet you." We finished the meeting and I returned to Spain.

I continued daily contact with Florian throughout July. One day, Florian called and informed me that Jack Smith is preparing to arrest the entire top government people in Kosovo. We continued to talk about this

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subject for several days and weeks. During one conversation, Florian told me that Jack Smith thinks that I could help him prepare for court proceedings. I readily agreed to help.

One day in late July or early August, we were talking on the phone via the application known as Signal. Florian asked me if I was ready to assist in the operation in Kosovo. Two or three days later, he called me again and said that "our office from the Agency and Prosecutor Jack Smith" had decided to include me in the operation. He said they had prepared some dossiers of war criminals that are in Kosovo. The dossiers were in Belgrade. Florian needed the dossiers to be illegally leaked in Kosovo. He said the prosecutors had spent a lot of money on their investigation of war crimes. I responded with, "How can I help?" He said when the dossiers are released in Kosovo, it will be a big alarm. He said these are secret dossiers from the Prosecutor's office about war crimes. I asked what my role in the operation would be. He said that Prosecutor Jack Smith said we do not have enough evidence to arrest the people yet and they needed to change their tactic. He explained that my role would be in the operation would be to help them get the evidence they needed. Florian had already leaked the information in Kosovo through Serbian assistance. I assumed it was with Serbian intelligence services. When the dossiers would be released and the people on the dossiers began to panic, my job will be to approach these people and ask them for money to remove their names from the dossiers and charges of crime. Florian explained that this would be the tactic to be used. If the people agreed to pay the money, the Prosecutor's office would know that they were guilty. I asked Florian, "What if they give us money?" Florian explained that I would receive 10% of all money that was paid and that the remaining 90% would go into their black account to finance future operations in Kosovo by the Prosecutor's office.

Around September 10, 2020, Florian provided me with three phone numbers of people who were on the dossier. Hours later, I had contacted all three. All three of these people were angry with me. They told me they would not pay and to never contact them again. I reported these phone calls to Florian. He told me that it was okay and not to worry.

A few days later, Florian called me. He was angry with me. He told me that I had failed to study properly to get those people to pay money. Then he told me that he needed to justify to his Agency why they had hired me to work with them. He said that he needed me to show the Agency how I can bring value. Florian suggested that I can show value by voluntarily helping with the "black funds" of the Prosecutor's office. I asked, how much should give. Florian said that $4-500,000 euros in cash would be sufficient.

During the next few days, I was thinking about should I do this. I was worried that if I do this, the people will turn against me. I wanted to turn back time and not be involved in any of this. I finally decided to pay the money. Over the next few days, I organized the payment of $400,000 euros. I took the money to a member of my family in Brussels. He delivered the money to Florian. Three hours after my family member delivered the money, Florian called to inform me that everything was okay.

Two or three days later, Florian called. He told me that someone wanted to thank me for my donation. He put someone else on the phone who thanked me very much for my donation. I recognized the voice as Prosecutor Jack Smith as we had one discussion on the phone in June of 2020. He said that Florian would be in touch with me about future operations. Florian and I resumed our daily phone conversations.

A few days later, Florian called again. He said that Jack wanted to know if I could help them with testimony because they did not have enough evidence to arrest the people. He said that any help would

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be very much appreciated. He said that it would help my country, the Prosecutor's office in the Hague, and the United States. Then he began to train me on the testimony to provide. A few days later, he told me that I need to be in the Prosecutor's office in the Hague to give this testimony on October 1, 2020. I was worried about the situation. But I was convinced by Florian that all these people were bad. So, I decided to go forward with the testimony. I arrived in Brussels on September 30, 2020. But I was still unsure of the testimony that I was to give. I reported to Florian that I had arrived. Florian asked if I would be ready in two or three hours. He asked me if I had a pen to take notes of my instructions. I heard a person in the background, and I recognized the voice. Florian called him by name, Jack. Jack spoke to him in English, and Florian spoke to me in Albanian. I took notes of my instructions in my notebook of the testimony I was to give. After this conversation, Florian told me to go to the hotel that he provided close to the Prosecutor's office in The Hague.

The next day, October 1, 2020, I walked from my hotel to the Prosecutor's office in The Hague. There I was met by a British prosecutor name David. Next, I met with an American prosecutor. His name was also David. I never worked with the British prosecutor David again. I gave my testimony to the American prosecutor named David. The room had been prepared with video cameras and a microphone. In the room was the American prosecutor David, a German investigator, and an Albanian translator. During the testimony, I looked at my notebook several times to ensure I said things correctly. The American prosecutor asked me what I was looking at. I told him that I had made notes to organize my thoughts during testimony. He asked me if he could make a photocopy of my notes. I agreed. He took my notebook to a copy machine and made a copy of my notes. This session lasted 4-5 hours. David then told me that we would stop for the day and extend my hotel so I could return the next day.

On October 2, 2020, I walked to the court in the morning. We resumed our session of giving my testimony. During the breakfast break, everyone left the room except for me and David. David turned off the camera and microphone. Then he told me, "Listen to me carefully, Mr. Sahitaj, I have here on my desk, most of your life history. In my analysis, in the last 30 years, nothing connects you to anything with these people in Kosovo, Serbia, politicians, or war crimes. You were not living there before the war, during the war nor after the war. Can you tell me one thing, you are not obliged. But can you tell me who you are working for, who gave you the information, and when did they give you this information." I explained to him that my source is classified. As small talk, I asked David, "Where is Prosecutor Jack Smith?" David said, "At the moment, Jack Smith is not here but I have been informed by Jack that you will come for this testimony."

After the breakfast break was over, I gave testimony for another hour. David thanked me for my testimony. He said that the information I provided was very important. David told the German investigator to exchange phone numbers with me so that in the future, we could be in contact if needed.

When I departed the building, I immediately called Florian. I told him that I had finished my testimony. He advised me to make two selfie videos with the prosecutor's office in the background. I was to explain that this is the beginning of the end. I was to do one video in Serbian, the other in Albanian. I made the videos and departed in my car to Belgium. About two hours into my trip, Florian sent me a screenshot of a phone message he received from Jack Smith. In the screenshot, the message said, "Your Spanish friend has done a good job" with a thumb's up emoji. Later in the evening, I received a message from a Kosovar journalist asking if I had made testimony to The Hague. I was shocked. I cannot describe just how much I

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was shocked. I asked the journalist how he could know this information. His reply was that he had many sources and contacts through his job as a journalist. He refused to reveal his source to me.

Around 7 October, I was in Monaco. When I was speaking with Florian on the phone, he suggested that I go to Serbia. We decided that I would drive to Austria and meet with him. He was driving from Belgium. We met near Vienna. Then, in my car, we drove to Belgrade. During the drive, he said he wanted to introduce me to his CIA colleagues in the Balkans.

The day after we arrived in Belgrade, we were going to a lunch. I assumed we were to meet with some U.S people. Instead, we met with the second-in-charge of the Serbian intelligence, Boyan Dimic, the commander of the Gendarmerie, and Milan Radojcic, a known Serbian radical politician associated with the mafia. During the two- and one-half-hour meeting, Florian told me approximately twenty times to go out and have a cigarette so that they could speak in private. When we finished, we returned to the hotel. At the hotel, I asked Florian when we were going to meet with the Americans. He said maybe the next day.

In the next morning, Florian told me that he had some official business to take care of and he would see me in two or three hours. But I did not see him again until the evening. When I saw him around 5pm, he said he had some urgent business in Austria, so we packed our bags and departed. We never met with any U.S. officials. He informed me that we needed to stop at the airport in Belgrade to pick up a person. We went to the airport and picked up a Russian female that had arrived from Turkey. During introductions, Florian said the woman was a friend that works with him returning from an official trip to Turkey. The woman's name was Sofia Plotnikova. She was going to accompany us to Austria. When we arrived at the border, I was still driving. When we were going through Passport Control, I passed all our IDs to the official as I was driving. When the official returned the IDs to me, I noticed that Florian's ID said the name Faik Imeri. I immediately asked Florian why he had a different name on his ID. He said because he is an agent, and they often use fake IDs and names. He told me in 5 or 6 months, I also would receive a fake ID from the Agency. We spent the night in a hotel. The next day, we parted ways and I returned to Spain.

After I returned home, I maintained daily contact with Florian. He mostly asked about Russin oligarchs. He tasked me with finding Russian oligarchs who were on the U.S. sanction list so that we could offer to assistance to get them off the list or keep them off the list. I asked Florian what the procedure would be if I found people on the sanction list. Florian explained that there are two important criteria for the individuals. First, they would have to sign a contract to work for the Agency and give us information about Vladimir Putin. Second, they would have to pay money into the black fund for operational expenses. I immediately said to Florian that if this is not true, please do not make trouble for me with the Russians. I did not want to risk my life nor the lives of my family if this was not true. Florian explained that he had spoken directly to Prosecutor Jack Smith about this. Smith had told him that he had colleagues in OFAC and this was all possible. He told me that during this operation I would be working directly for Jack Smith.

On November 7, 2020, Florian called. He said I have someone that wants to speak with you. Then, Jack Smith got on the phone. He said he is very grateful for my help in Kosovo. Smith also said that they could not have made the arrests without my help.

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Soon thereafter, I located a Russian man that met the criteria Florian had given me. The man's name was Michail Prochorov. I contacted him and offered to help him get off or to stay off the sanction list. At this time, I cannot remember if Prochorov was already on the list or being threatened with being added to it. He asked if I was certain. I assured him we could help him with the list. Prochorov decided to send his security man to meet with Florian in Brussels in late November. I do not know what happened in this meeting, but I was told that it was one CIA special agent and a special prosecutor. I spoke with my intermediary with Prochorov. He said that it was a good meeting and he wanted to continue a relationship with me and the people. Florian called me and asked me to ask the Russian man to meet him in Zurich on December 17, 2020. I called Prochorov and relayed the message. Prochorov immediately agreed to meet Florian. Florian told me that I should also attend this meeting.

Early in the morning of December 15, 2020, the Spanish Special Police raided my home. They were wearing body armor and masks and were heavily armed. The Police arrested me, my wife, and my son. I was arrested for extortion and money laundering.

While in prison, I waited for Florian or someone else from the Agency to have me freed. But I received no help or visit. In July 2021, I was given access to a phone. I called Florian from the prison. He said that he was having difficulty getting my freedom. A few days later, Florian called me. He said he had an urgent task for me. He said I will receive a phone call and I would be asked, "Who arranged the meeting between Vladimir Putin and Kosovo President Hashim Thaqi?" I was told to respond that I arranged the meeting through two Russian oligarchs. I believed this was a big opportunity for me to gain my freedom. I wanted to gain my freedom. I was hopeless. Florian told me to make this lie so he could record it and help his office. Again, help never came to me.

On September 16, 2021, I was offered the chance to pay bail to the Spanish court. The bail was $100,000 euros. I arranged the bail through my friends and gained my freedom.

When I got out of the prison, I called Florian. I was not happy with Florian and told him. He explained that in their profession these things happen often. Florian told me to relax for a couple of weeks and then we would resume working.

Two weeks later, Florian called and said that he had waited for me while I was in prison. He wanted me to resume meetings with the Russian oligarch I had previously contacted. Florian said that he had told the oligarch that I was on an official assignment in Asia instead of prison.

Two days later, Florian called. He stated that Prosecutor Jack Smith wanted to speak with me. I could hear Smith speaking in English to Florian who translated to me. Smith said that he was sorry about what happened to me and my family. He said he had done everything he could to help me get out of prison. Smith also said that it would be good for me to continue to speak with the Russian oligarch regarding his case.

Shortly after, I called the Russian oligarch. He was happy to hear my voice. The Russian asked me to meet him in Switzerland. I followed all the instructions that Florian had given me. I could not leave Spain because of my bail requirements. Florian had instructed me to tell the Russian that I was still far away and could only talk with him on the phone. Florian directed me to only speak on the phone with them and to ask them the most important question, will he sign a contract and work for the Agency. If he agreed to sign, I was to explain the second requirement. If he did not agree to sign, I should not tell him

anything more. The second requirement was to pay a fine to the U.S. Government because the Russian was on the sanction list. If he agreed to pay the fine, we would tell him about the amount in two days. Also, he was to use the lawyer that we tell him to use. And finally, the process would take about one year to complete.

I called the Russian, he agreed to sign and to pay the fine. The Russian wanted to meet face to face to learn more details.

I received a call from Florian in the middle of December. He asked me if I knew people from the former Yugoslavia that now live in Marbella. I said, yes, I know many. Florian asked specifically if I new a man from Montenegro named Darko Parovic. I replied that I know a man named Darko but do not know his family name. Florian then texted me the passport photo of the man named Darko. I recognized the man. I asked why Florian's office has any business with him. Florian directed me to strengthen my relationship with Darko so that Florian could meet him face to face. Florian explained that his office wanted Darko to get a message to the president of Montenegro. He said Prosecutor Jack Smith wanted to do in Montenegro what he had done in Kosovo. The difference was in Kosovo, there were war crimes. In Montenegro, it was corruption, organized crime, and political assassination. After the conversation, I called Darko and explained everything to him as directed. I provided him with the contact information for Florian.

I resumed my duties on the Russian case. A few days before the New Year, I received a call from Florian. He directed me to contact the Russian Michail Prochorov to see if he is friends with Vladimir Potanin. I called Prochorov and asked. Prochorov replied of course Potanin is his best friend, and they communicate very often. Florian told me to tell Prochorov that if his friend, Potanin, wanted to get off or stay off the sanction list, he would not have to sign a contract to work for the U.S., but he would have to pay a fine. I cannot remember if Prochorov was already on the list or was going to be added to it.

Around mid-January 2022, I received a reply from Prochorov that Potanin agreed to pay the fine. I informed Florian of this communication. Florian informed me that the Special Prosecutor Jack Smith was out of the office but when he returns, they will speak again.

Near the end of January, Florian called me to tell me that he had spoken with Jack Smith. He told me that Jack Smith wanted to know if Potanin was still in possession of evidence of corruption by Hillary Clinton. Or, if he had shared the evidence with anyone in the Secret Service.

I transferred this message to Potanin. I replied to Florian that Potanin does still have the evidence and he had not shared it with anyone.

In the beginning of February, Florian called me and said he wanted to tell me some private secrets. Florian said, "I never told you, but someone killed my brother, Haki Imeri, in Kosovo about twenty years ago." He explained that he had previously believed the President Thaqi gave the order to kill his brother. Recently, Florian found out that the president did not give the order. I asked Florian, who gave the order? He told me that he now believed that Qerim Kelmendi killed his brother. I asked him if Kelmendi had been arrested and put in prison. Florian replied that he is not in prison, and he has finished with him. I did not understand exactly what he meant.

A few days later, I called some people I know in Kosovo and asked about Qerim Kelmendi. I was informed that he had been killed by special commandos.

H. S

The next time I spoke with Florian, I told him that I heard that Qerim Kelmendi had been killed by special commandos. Florian laughed and said, "I don't forgive anyone."

A day or two later, Florian called and said he had a job for me. He gave me two names in Kosovo. He said that they were personal friends with President Thaqi. Florian told me to talk to them and tell them that now is the time for the family and friends of President Thaqi to pay their fines to the court so that they do not receive actual charges. He told me that there were many accusations including murder and political assassination. Florian said that his office had received new information about the accusations and knew they were false. But he still wanted to have the people pay fines. I told Florian that I do not want to make promises to the people in Kosovo if I could not keep them. Florian assured me that he had spoken with Prosecutor Jack Smith and that every promise would be fulfilled.

A day or two later, I called a close friend of President Thaqi. Florian had given me the name and phone number. This person explained to me that he believed that they are all innocent, and that the truth would protect them. He told me to never call him again.

Around the 9th of February, Florian called me to say that we need to meet with the Russian people. He said that because I was still under travel restrictions, Sofia whom I had met with before, would take over my role as the intermediary with the Russians. The same day, Florian told me that I need to call the man from Montenegro, Darko, to remind him he would meet on February 11 in Zurich with Florian and an assistant to Prosecutor Jack Smith. I passed the message to Darko.

Between February 15 and February 20, my relationship with Florian seemed to turn for the worse. He no longer made daily phone calls. We went as much as two weeks without communicating. When we did talk again, I asked why. He said his office was no longer happy with me, but he was going to find out why. After another week, I called Florian and told him I must know why they were not happy with me. Florian explained that his office had received orders to stop communicating with me for some period. He said that I had spoken too much to other people about operations. I was infuriated. I yelled at him and reminded him of all the jobs I had told for him. I told him he had used me in Kosovo. He used me for access to Darco. He used me for the Russian contacts. I told him that he and Jack Smith had used me to lie in The Hague about President Thaqi. I told him I had done all of this for Florian and his office. Florian replied that he is an official government representative, and I could not speak to him this way. He told me that I know where he works and he could easily destroy my life, my family, and everything I had ever worked for. I called him some bad names and ended the call badly.

I waited a few days to see if Florian would call me back. Florian did not call. I realized that the things I did for Florian were very dangerous and I could be attacked. For protection, I called the U.S. Embassy in Madrid, Spain. I was instructed to send an email to the embassy with the details of my claims. I sent the email to the embassy.

Around the same time, I had submitted my Serbian Passport for renewal. A couple of days later, I was contacted by the second-in-charge of the Serbian Secret Service. He was very angry. The man told me that he had been informed by Florian that I had recorded him so the tape could be used against him. He said that Florian had kept the tape out of the courts to protect him. He told me that I was crazy to do that. He said he would have me extradited and I would have to pay. I denied his accusations and told him that he had been misinformed.

H. S

A few days later, my lawyer, Andrea Muller, called me from Germany. He told me that he had been called by Florian. Muller told me that Florian said he was with the U.S. State Department and wanted to make an appointment to visit. My attorney made an appointment with him.

Florian met with my attorney in his office. Florian presented himself as a Special Agent of the CIA. He said he oversaw many CIA analysts in Europe. He said that he works very closely with Prosecutor Jack Smith in The Hague. My lawyer said that Florian told him that he should have nothing to do with me or represent me because I am a criminal and a bad man. My lawyer told Florian that all his clients could be criminals or honest people. His job was to prepare a case for the judge to decide. My lawyer told Florian that he would continue to represent me.

After Florian visited my lawyer, I understood that I had been used by Florian and Prosecutor Jack Smith. I realized how bad the situation was and that I had endangered my family. I believed that Florian had started attacks against me by the people in Kosovo by spreading lies about me. I also realized also that mine was the main testimony that was responsible for the imprisonment of President Thaqi. After realizing all of this. I felt that I needed to contact the duty prosecutor in The Hague.

I called The Hague. I introduced myself. I explained that I had been in The Hague and provided testimony in the past. I told him that I wanted to make a report on CIA Special Agent Florian and Prosecutor Jack Smith.

A day later the duty prosecutor called me with appointment details. He said that in three days, I would do a Signal phone call with Mr. Alan Tieger.

On approximately April 22, 2022, I received a Signal call from Alan Teiger. On the call was a translator, Alan Tieger, and two investigators. We spoke for around one and half hours. Mr. Alan Tieger can provide the details of the conversation. However, Mr. Tieger informed me that they were going to record the conversation, and everyone consented, so I recorded it as well. I can provide a true and accurate copy of that recording.

Weeks later, I received a phone call from my intermediary with the two Russian oligarchs. The intermediary told me that my CIA contact had extorted $16,000,000 in USDT from the Russians. I asked how the CIA had done that. The intermediary told me that Michal Prochorov had paid seven million and Vladimir Potanin paid nine million. The intermediary told me that Prochorov said that I know owe him seven million dollars.

I, Halit Sahitaj, declare under penalty of perjury that the foregoing is true and correct. I am willing to testify under oath of the foregoing facts in any future proceedings. This document was executed on October 3, 2022.

Halit Sahitaj

HALIT SAHITAJ

EXHIBIT D

Statement of Darko Perovic

5 October 2023 Marbella, Spain

I, Darko Perovic, a citizen of Montenegro born on April 30, 1969, passport number 3004969210238, make the following statement to the American government without coercion nor promise of any benefit or reward. This statement is based on my personal knowledge.

In mid-December 2021, I was contacted by Mr. Halit Sahitaj. He wanted to meet with me. I had known Mr. Sahitaj before and agreed to meet with him. The next day, Mr. Sahitaj came to my home in Spain. He explained that he was in touch with people who were working for the American government, the Special Prosecutors Office, and the Hague Tribunal. He said this office was responsible for arresting several people for war crimes in Kosovo including former President Thaqi. Mr. Sahitaj said that the man from the Proscutor's Office named Florian asked him if he knew Darko. Florian had details of my life that only a friend would know. Mr. Sahitaj, said that Florian knew that I was close to Milo Dyukanovic, the president of Montenegro. He also knew that another friend, Zoran Lazovic, was the commander of the Montenegro Special Police Anti-Crime Unit. Florian's office had great interest in those two people. I asked why they would have an interest in Montenegro because we were not involved in the war, and it did not make sense. Mr. Sahitaj told me that the Prosecutor's Office, led Mr. Jack Smith, was focused on cleaning up corruption in Kosovo and the region including Montenegro. He said the U.S. government was working closely with the Hague Tribunal to help the Balkans recover from the past war crimes, political assassinations, and organized crime. Mr. Sahitaj told me they had a special list of 16 people from Montenegro that he wanted to investigate and possibly arrest. I asked what these people had done. Mr. Sahitaj only answered that they had done many things. Mr. Sahitaj said his contact, Florian and Prosecutor Smith wanted me to send a message to Montenegro directed to President Djukanovic and Police Commander Lazovic. I told Mr. Sahitaj that this sounded strange but okay, let's get to the bottom of this. I asked if he was certain that these people worked for the U.S. government. Mr. Sahitaj replied that he is sure and has seen the badge of his supervisor, Florian. I told Mr. Sahitaj to have Florian call me and we could discuss this further.

The next day, I received a phone call from a gentleman who said his name is Florian. He said he works for the U.S. Government in the Tribunal at The Hague. I recognized immediately that this man had a heavy accent and did not speak English as an American. I told him he did not sound American. He said that he was born in America but grew up in Europe. We talked and he explained that he works for Prosecutor Jack Smith in the Hague Tribunal. He said that their office had successfully cleaned up Kosovo and now they want to start operations in Montenegro. I asked him why Montenegro because my country was not involved in the civil war in the former Yugoslavia. He told me no, but the previous leadership in Montenegro had a lot of corruption and they were going to use the tribunal to investigate and to clear the road for Montenegro to become a full member of the European Union. He asked me if I was available to travel to Montenegro to speak directly with the President and the commander of the Special Police Anti-Crime unit because they were both at the top of the list. He said he would like to give Montenegro the opportunity to cooperate and see if there is any truth to the corruption. I replied that I do not know. I have not been in Montenegro for a long time. I don't know all the accusations against these people but, I am willing to go. He asked when I could travel. I agreed to go to Montenegro after the New Year.

Around January 7, 2022, I traveled to Montenegro. The next day, I met with Zoran Lazovic, the commander of the Special Police Anti-Crimes Unit to discuss the accusations. I relayed to him what the Tribunal was preparing to do in Montenegro. He was shocked. His response was the same as mine, what do we have to do with the Tribunal. He quickly agreed to cooperate with the Tribunal.

The next day, Zoran and I met with President Djukanovic. I explained all the details that Florian had told me. The president was also shocked of this information. The President authorized me to go to Brussels to speak with Florian about Montenegro. I returned home to Spain.

Two or three days later, I flew to Brussels. This was about January 22, 2022. I checked in to a hotel. The hotel was Courtyard Brussels, Rue Joseph II 32, Brussels, Belgium, 1000 for the visit.

The next day, Florian sent a driver to pick me up at my hotel. He transported me to a building called De Jacht Heverlee located at Naamsesteenweg 581, 3001, Leuven, Belgium. There, I met with Florian for two or three hours. He introduced himself as an Agent of the CIA and working closely with the Hague Tribunal. He told me about some things they had done in Kosovo and now want to do in Montenegro. He said he was part of Prosecutor Jack Smith's team that was responsible for arresting President Thaqi and many others in Kosovo. He asked me if I spoke with the President of Montenegro. He asked me if the President would like to meet with him and someone from Prosecutor Jack Smith's office. Florian asked if they were prepared to cooperate with the Prosecutor's Office. I informed him that the President was willing to cooperate because he and Montenegro have nothing to hide. I told him the president would be transparent. He asked if I knew of the tension between the pro-Serbian and pro-Montenegrin political parties. Throughout the discussion, he asked many questions about Serbia and Montenegrin tension as well as Russian influence on Montenegro. But during the conversation I realized that he was favoring Russian and Serbian influence on Montenegro. I believed this to be odd for someone who worked for the United States and especially Prosecutor Jack Smith's office. He also said that my friend, Zoran is on Jack Smith's list of 16 people in The Hague Tribunal. Florian asked if Zoran and I could meet him in Switzerland on February 11, 2022. I told him that I would speak with Zoran, and I do not think the meeting would be a problem.

After a few hours of the meeting, I prepared for a taxi back to Brussels. Florian told me that I would have to provide receipts of the hotel and travel to him so that he could reimburse me for the travel. I told him that reimbursement was not necessary. He told me it was very important to his office. I told him that I did not like it, but I gave him the receipts. He said that he would reimburse me the next time we meet. I flew home to Spain. I stayed in Spain for one week to ten days before returning to Montenegro.

During this trip I met with Zoran. I explained to him that Florian would like to meet in Switzerland on the 10th or 11th of February. At this time, Zoran in his profession in the Anti-Crime Unit had a bounty on his life of $2-5,000,000 from two of the largest criminal organizations in the Balkans. He did not like to travel outside of his safe area. But he decided to join me for the meeting in Switzerland. I explained that Florian had said he and an assistant to Prosecutor to Jack Smith would be in attendance.

Also, during this visit, we met again with the president. We explained that we were going to Switzerland for this meeting. The president encouraged us to get all the facts of this case.

On the morning of February 10, we departed Montenegro in two cars. I was in one car while Zoran had another with two of his bodyguards. We drove from Podgorica, Montenegro, through Dubrovhik in

Croatia, and arrived in Zurich around 2:00 in the afternoon. We occupied our hotel, Neues Schloss Private Hotel, Zurich located at Stockerstrasse 17, Zurich. I received a phone call from Florian informing me of a meeting the next day, February 11, around 12-1:00pm.

The meeting was in the Park Hyatt Hotel, Zurich. The meeting room was through the entrance, to the right and all the way down the hall. It was a banquet room of the hotel. Already in the room was Florian and a man that said he was an assistant to Jack Smith. The man was around fifty years old. He was wearing a suit and hat that looked like a French style hat. They used an iPad to photograph Zoran's passport. Then they had us both sign non-disclosure agreements on the iPad. Officially for this meeting, I was to serve as the translator between the investigators and Zoran. The electronic form said The Hague Tribunal across the top, under that it said Special Prosecutor's Office, under that it said Special Investigations Unit. We signed the documents despite being uncomfortable with it. As I signed the NDA, I cannot reveal the full details of this meeting. But I will list some points from the meeting. They asked many questions about the unresolved killing of some Albanians in Kosovo and Montenegro. Other information that they shared was that in 2015, Kosovo President Thaqi had shared very bad information with the American agencies regarding the Montenegrin President, Milo Djukanovic and the state of Montenegro. They claimed that was the reason that the USA had turned their back on Montenegro in recent years. Zoran and I looked at each other because we did not understand where they were leading the conversation. With their next topic, we realized where they were going. They asked Zoran if President Djukanovic would testify in The Hague regarding President Thaqi. Zoran replied that he did not know anything about President Thaqi and that he was not authorized to speak on behalf of the president. But again, these are summarized points of the conversation. Because of the NDA, I cannot fully disclose the details. The meeting lasted 2-3 hours. When it was over, Zoran and I returned to our hotel. The next morning, we returned to Montenegro.

Two days later, Zoran and I met with President Djukanovic to inform him of the meeting. The president was shocked at the news about President Thaqi. He said that he and President Thaqi maintain a good professional relationship and denied having anything to do with personal relations. When the meeting was over, I remained in Montenegro for a few days. Florian called me a couple of days later. He asked me if I could contact a gentleman named Ilir Capuni. He was the second-in charge of the FOCA Political Party which was the Albanian minority party in Montenegro.

I met with Capuni. His party was partnered with the DPS Political Party during previous government coalitions. President Djukanovic belonged to the DPS Political Party. Capuni wanted to meet President Djukanovic. I also learned that Capuni was close friends with Dritan Abazovic. Abazovic held a higher position in the government as the Deputy Prime Minister and Coordinator for all Security Services. Then we ended that meeting.

A few days later, Zoran, Capuni, and I met with the president. We discussed the political situation in Montenegro. Capuni assured the president that his party is always pro-Montenegrin and gives the president their full support. This meeting was very late at night due to the president's schedule. We started around 11:30pm and went to nearly 1:00am.

I remained in Montenegro a few more days before returning to Spain. I was only in Spain a week or so when Florian called to tell me to come to Brussels for a meeting. I departed as soon as I could.

After arriving in Brussels, I took the train to Leuven and checked into Hotel Novotel near the train station. Florian came to my hotel, and we went for a walk to a nearby brasserie for a drink. He told me that he talked to his office, and they wanted to help Montenegro. He said he needed me to call Montenegro to get permission for six or seven future political leaders from the DPS Party to come to Brussels. In Brussels, Florian was going to assess their political views and ideology of the region and the future of Montenegro. He would present his final assessment to Prosecutor Jack Smith and his office. Florian also said that his office and Prosecutor Jack Smith's office believe Montenegro should not be punished, and that the U.S. wanted to help clean up the corruption. He said that some people would need to be arrested. He said that the program would take 3-5 years. Then, he grabbed a small piece of paper and wrote "$100,000,000." He did not say the words, only wrote the numbers. I said wow that is a lot of money. He explained that it was the goal and would be collected from Montenegrins over the time of the program. I told him that I didn't know people that have that much money. He told me that the people I had been talking to have the money or knew who did. I replied, "Let's see." Next, we talked about how Russia and Serbia had injected a lot of money into Montenegro so that they could win influence in the country. The meeting ended and I returned to Spain the next day. While traveling, as I reflected on the meeting, I believed that everything we discussed was very odd. However, I decided to stay involved so that I could learn more.

After returning home, I spoke with Zoran and received permission from the president to do as Florian had asked. We organized the event. We did not tell the future leaders exactly what the visit was for. Instead, we told them it was for a European assessment. The event was scheduled for March 10th through the 15th in Brussels. At the end of these statement, I will attach a statement and information regarding this event as well as the participants.

Florian and I continued daily conversations on the phone. After the event in Brussels was over, he informed me that he would like to have a meeting in Montenegro. I told him we should wait a little bit and I would let him know when. He agreed to wait.

In April, I traveled to Montenegro. I met with Zoran. I told him about my meeting with Florian. I explained how Florian had written "$100,000,000" on paper. Zoran said that Florian's office had a big expectation. We both joked that we wished we could afford to pay that much.

Around this time. The government of Montenegro collapsed. The government would be forced to conduct an election to replace its leaders. Florian called me sometime in mid-April and told me to get a message to Zoran and President Djukanovic telling them not to support Deputy Prime Minister and Coordinator for all Security Services Abazovic nor let him become the Prime Minister. I relayed this to Zoran, and he sent it to Djukanovic. However, Abazovic was given support by former President Djukanovic and the DPS Party to form a new minority government.

On April 28, 2022, Abazovic was appointed to be the Prime Minister of Montenegro.

Florian and I continued to communicate. He often said he favored indirect Russian and Serbian influence in Montenegro. As a Montenegrin, I always found it odd that the U.S. would favor Russian or Serbian influence.

In May, as I reflected on everything that I knew about Florian. I began to believe that he was actually working for a foreign government. I had learned his real name was Faik Imeri. I had learned his date of

birth. I decided that I should contact the United States to report this. I decided to contact the Regional Security Office (RSO) of the U.S. Department of State, in Washington, D.C. The only response from RSO was, "We will get back to you."

My communication with Florian became less and less. In mid to late June, we stopped communicating.

On September 10, during the Young Political Leaders Group Conference in Brussels. The group leader was approached by Florian. Florian told the group leader to get me to call him. The group leader called me to pass the message.

I spoke to Florian on the phone. We made small talk about traveling a lot and being busy. The call ended on good terms but there was no mention of communicating in the future. That was the last time that I spoke with Florian.

Attached to this statement is a report that I made regarding the visit of Montenegrin Young Political Leaders to Brussels to visit with Agent Florian.

I, Darko Perovic, declare under penalty of perjury that the foregoing is true and correct. I am willing to testify under oath the foregoing facts in any future proceedings. This document was executed on October 5, 2023.

Darko Perovic

Report on Special agent Florian

SPECIAL PROSECUTOR JACK SMITH-chief prosecutor at the Kosovo Specialist Chamber at The Hague

Special agent Florian

Montenegro

Serbian Intelligence Agency - **BIA**

Russian military intelligence agency - **GRU**

Darko Perovic

Ilir Capuni

Montenegro

Zoran Lazovic

Prime minister Dritan Abazovic

President Milo Djukanovic

Report on the visit to Brussels and the meeting with the mr Florian in Podgorica

Brussels-Leven

Duration of stay 10-15. March.

I led six young leaders of the DPS party to Brussels (Leuven).

10. March - After arriving in the evening at the Accor Hotel in Leuven, I met Mr. Florian in the lobby of the hotel. He wore a covid mask even though it was not mandatory. After a short conversation, we parted ways and organized a meeting for tomorrow.

11. March The gentleman announced the location shortly before the meeting itself. The meeting was organized in the De Jacht Haverlee facility. All six young politicians attended. The duration of the session was around 3 hours.

I met the gentleman for lunch. He reached the hotel by bicycle, from where we walked to a nearby restaurant near a train station. During lunch, we talked about politics, geopolitics, philosophy, and similar topics.

Since three participants had to return earlier, two separate meetings were planned in two groups of three.

The gentleman talked to the participants who were supposed to return in the hotel lobby, although this was not planned, we were waiting for him to tell us the location. The gentleman came and talked to the participants without informing me.

The meeting with the second group was on March 14 at Brasserie 500 Leuven Haverlee. I attended. We had a lunch.

Podgorica

On September 10th, Mr. Florian arrived in Podgorica and contacted one of the participants to arrange a lunch for the following day, September 11th. I was informed about the visit a few weeks prior and met with the gentleman at Zepellin Cafe, close to the Hilton Hotel. We spent around 2 hours discussing. A participant suggested a local restaurant for lunch, as the gentleman had expressed an interest in trying local specialties. He was considerate and changed the meeting time by an hour. Three participants attended plus a boyfriend from one participant. Konoba Bandici, located 15 minutes from the city center, was the chosen restaurant for our meeting. During lunch, the gentleman shared a lot of information and talked extensively. He was accompanied by a friend who drove a Mercedes with Austrian plates, seated at a separate table.

Mr. Florian stated the following at the meeting :

-According to a certain plan, Montenegro should not exist in 30 years

-Abazović took large sums of money, he spent them on highly paid consultants

- The church should respond to the church

- Religious organizations always win wars

- All wars are fought because of religion, the war in Ukraine is for religious reasons

- Criticized the USA for the war in Iraq and Afghanistan. Afghanistan - served for 5 years, also served in Iraq.

- The Vatican is a great evil, he repeated a couple of times.

-According to the gentleman, we should surrender in order to preserve the peace. He repeated it a couple of times using a metaphor.

- He met with Filip Vujanović - and asked whether he could find a new party. In August, he asked by phone whether Peda Bošković would start a new party. The date of the meeting with Vujanović is unknown.

- Russia has won all the wars in the last 20 years, it will win the war in Ukraine as well because 25 million Ukrainians will permanently leave the country

- Behind Edi Rama is the mafia that supports him

-Behind Abazović is someone from Montenegro

- Zelenski has 400 million in his account, he claims that he had access to the bank accounts. He spoke to him personally. He suggested that he recognize Kosovo as a response because Serbia did not impose sanctions on Russia.

- Russia has better relations with Montenegro than with Serbia. He met with the Russian ambassador in Syria, who informed him that rockets produced in Serbia were used in the war in Syria. The Russians had nothing against the NATO intervention in Serbia.

- The Uyghurs will defeat China because the victim always wins in the end

-He asked the young people if they think that someone with leadership and skills can replace the current president of the party, and they answered that it is difficult to do so, only if the mayor of Podgorica has the capacity. Mayor of Podgorica was Ivan Vukovic.

- He mentioned the possibility of young people founding a new party

- There are 2 Wests, the West that wants good for Montenegro and the West that pretends to want good

- Western structures often stand behind religious institutions, as well as behind Russian institutions. The West will support Serbia only if it does not form an alliance with Russia, they have already received everything from Montenegro.

- He mentions few times term a company

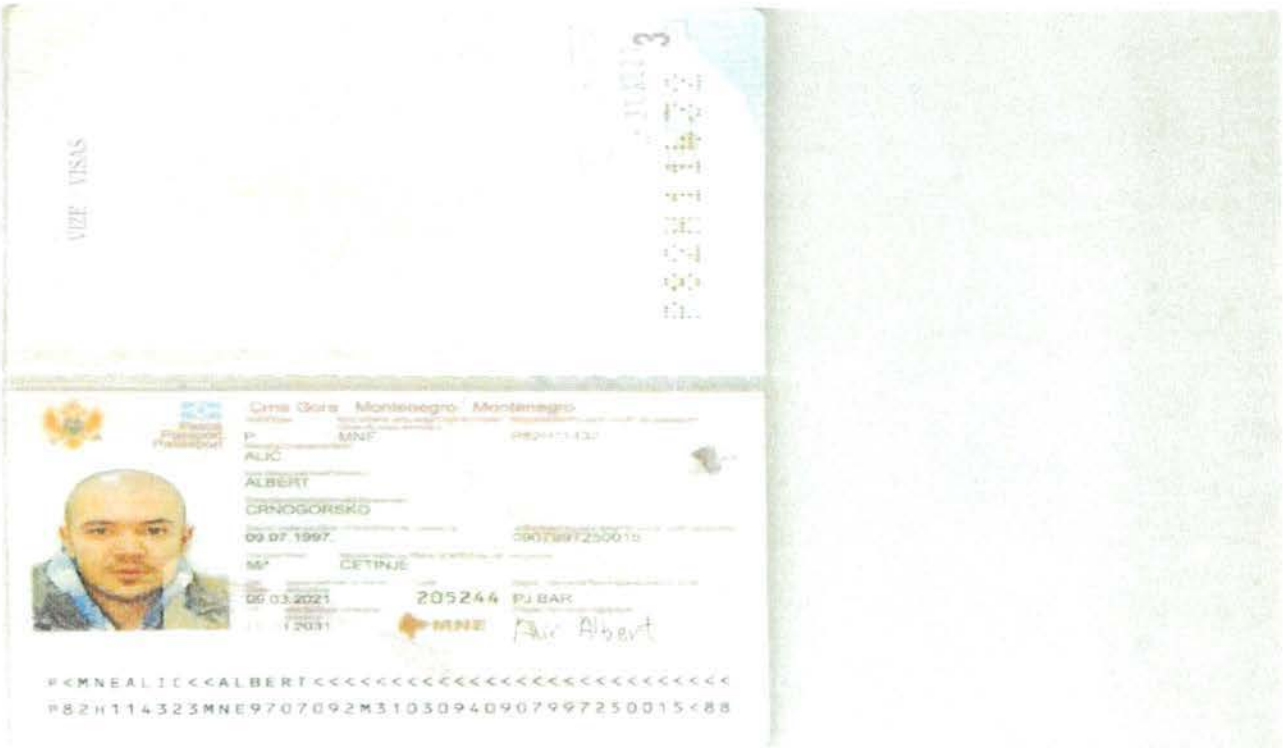
On next pages are passports of participants and their role in the DPS party.

Member of the main board of Youth DPS.

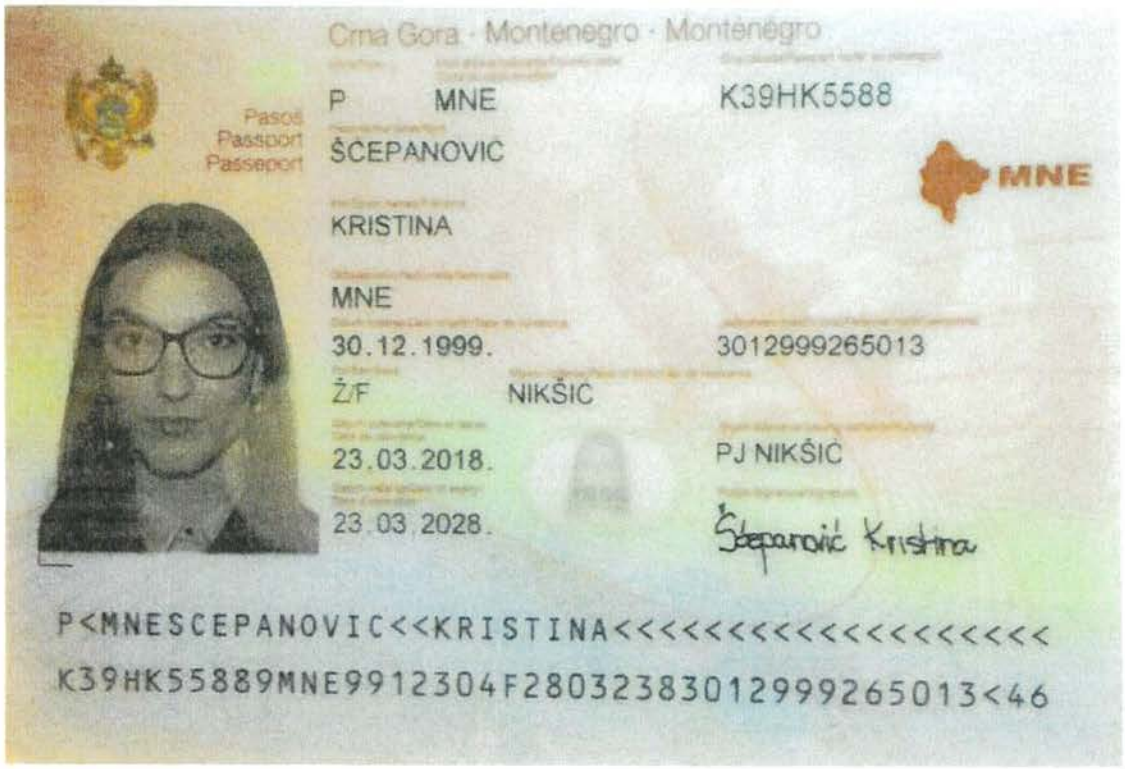
His father was minister of Defence and director of Agency for National Security

Member of the main board Youth DPS

In charge for municipality of Bar



International secretary of Youth DPS



Crna Gora · Montenegro · Monténégro

Pasoš
Passport
Passeport

P MNE K39HK5588

ŠĆEPANOVIĆ

KRISTINA

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Ž/F NIKŠIĆ

23.03.2018. PJ NIKŠIĆ

23.03.2028. Šćepanović Kristina

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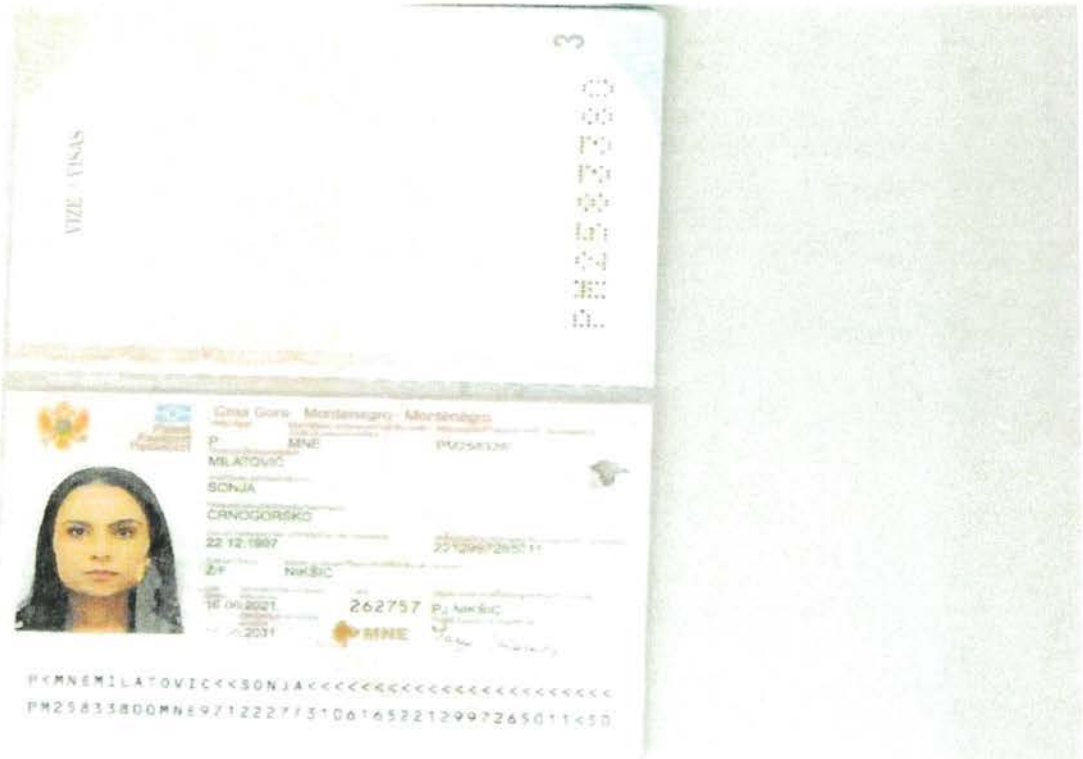

President of Youth DPS.

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VIZE VISAS

MNE PODGORICA ul 23.VI.16 23

MNE PODGORICA iz 30.I.22 23

MNE DEBELI BRIJEG iz 10.II.22

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EXHIBIT E

In the Matter of:

Interview of W04370

Interview of W04370

April 22, 2022

Phone: 703-837-0076
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1010 Cameron Street
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Friday, April 22, 2022

Telephonic interview of W04370, conducted by Alan Tieger, Senior Prosecutor, Specialist Prosecutor's Office, as translated by Interpreter LA, commencing 4:00 p.m.

- - -

1 MR. TIEGER: Okay. Good afternoon,
2 everybody.
3 THE INTERVIEWEE: Good afternoon. (Through
4 the Interpreter)
5 MR. TIEGER: It's April 22nd, 2022. The
6 time is approximately 4:00 o'clock in the
7 afternoon, and we are in a signal call with a
8 witness who has the reference code W04370.
9 My name is Alan Tieger. I'm a senior
10 prosecutor with the Specialist Prosecutor's Office.
11 With me is Investigator Danka Uber (phonetic), and
12 our interpreter is LA.
13 THE INTERVIEWEE: Okay.
14 MR. TIEGER: The purpose of today's call
15 is to follow-up on a phone call that we understand
16 W04370 had on the 13th of April -- excuse me, that
17 would be the 12th of April -- with Mr. Chris
18 Bennett.
19 THE INTERVIEWEE: Yes.
20 MR. TIEGER: And I understand that, at
21 that time, you, sir, wanted to provide additional
22 information about your interview on

1 October 1st, 2020; just by way of background, that
2 interview was with Mr. Harbach and Mr. Meyer.
3 At the outset of that interview, Mr.
4 Harbach advised you that this office was
5 investigating allegations of serious international
6 and transboundary crimes in Kosovo and parts of
7 Albania, between 1998 and 2000.
8 Mr. Harbach provided you with a copy of
9 your rights, under Rule 42 of the Rules of
10 Procedure and Evidence.
11 He also explained that you were there in
12 the capacity of a witness, that you had the right
13 to the assistance of an interpreter free of charge;
14 that the interview was being recorded -- in that
15 case, audio and video recorded --
16 And that it was a criminal investigation,
17 and any statements you made, may be used in
18 proceedings before the Kosovo Specialist Chambers;
19 That you were obliged to tell the truth,
20 and if you did not, you could be prosecuted before
21 the Kosovo Specialist Chambers, pursuant to Article
22 162 of the law establishing the Chambers;

1 If you believe that you might incriminate
2 yourself or your spouse, your parents or your
3 children, as a result of answering a question, you
4 could refuse to answer.
5 And you were asked if you understood your
6 rights and obligations, and I presume you still
7 understand that, those rights.
8 THE INTERVIEWEE: Yes, everything is
9 clear.
10 INTERVIEW
11 BY MR. TIEGER:
12 Q Now, I also understand -- and that is the
13 purpose of today's phone call -- that you contacted
14 Mr. Chris Bennett on the 12th of April of this
15 year, and indicated to him that you wished to
16 retract the information that you provided in
17 October of 2020, and did not want the SPO to rely
18 on that information, that you did not stand by that
19 information?
20 A One moment. Probably, there is a
21 misunderstanding here, because, in no way, I said
22 that I want to retract the information I've given.

1 Probably, this is a misunderstanding between myself
2 and Mr. Chris Bennett.
3 So I've given that statement by my own
4 free will, and I don't have any intention to
5 retract that statement. But there are some other
6 clarifications which I want to make.
7 Q And without going into detail on those
8 clarifications, sir, did you tell Mr. Bennett the
9 general nature of the characterization -- of the
10 clarifications that you wished to make to your
11 October, 2020 statement?
12 A If Mr. Alan would allow me, I would like
13 to explain the reason of the phone call to you.
14 Q Okay. Well, I -- can you first -- before
15 you tell me the reason for the call, sir, can you
16 explain what it was that you actually conveyed in
17 the call, to the extent you remember what you were
18 conveying?
19 A Okay. So the reason, the aim, the concern
20 that I contact him, which was my concern for the
21 phone call to Chris Bennett, related to what I did
22 four to five days later; I contacted the US embassy

1 in Madrid.
2 Q Okay, you contacted the US embassy in
3 Madrid. And?
4 A -- (Lengthy answer by interviewee
5 interrupted by the interpreter.) --
6 THE INTERPRETER: -- okay, okay --
7 MR. TIEGER: So we can understand, we need
8 for you to -- we're not getting any translation, so
9 you have to allow for periodic translation, please.
10 THE INTERVIEWEE: Okay. Sorry. (In
11 English)
12 THE INTERPRETER: So the reason which I
13 wanted to state to a senior official in the embassy
14 was my concern, was something of concern I had for
15 two or three weeks, which I did not want to explain
16 to other authorities, Spanish, Belgian or other
17 authorities.
18 (Interviewee continues with answer.)
19 THE INTERPRETER: Okay. So there were two
20 cases, one at the (unintelligible, audio
21 interference), and another one at the US embassy
22 near Madrid.

1 MR. TIEGER: Please stop for just a
2 moment, and I'll ask him another question.
3 THE INTERPRETER: Yes.
4 BY MR. TIEGER:
5 Q This discussion -- by the way, this
6 discussion with the senior official at the embassy,
7 took place some four to five days after your
8 conversation with Mr. Bennett, is that correct?
9 A More or less, yes. (Through the
10 interpreter)
11 Q All right. So, at the moment, I don't
12 wish to hear about your conversation with the
13 senior official.
14 I want to hear, to the extent you
15 remember, what it was you told Mr. Bennett when you
16 called him on April 12th.
17 You explained that you, in no way, said
18 you wanted to retract your evidence, and that it
19 must have been a misunderstanding; so, what did you
20 say?
21 A Okay. So, as far as the case I have
22 discussed with the US embassy, it's something I

1 discussed with them, so I will not discuss it with
2 you. I will discuss things that relate to you only.
3 Q And what I'm asking you about at the
4 moment is -- and again, I emphasize that the
5 purpose of this phone call is, what it is you said
6 to Mr. Bennett on April 12th?
7 A Okay. Okay. So, to Mr. Bennett I explain
8 that, since the witness statement I gave in
9 October, 2020, since, very terrible things, very
10 concerning things for my life, or the life of my
11 family have happened afterwards, and in relation
12 also with the work of the prosecutors, or the
13 prosecution office is doing.
14 Q Okay. And let me ask you some very
15 specific questions about the -- these things that
16 have happened, that have caused you concern for
17 your life, and for your family;
18 Have you been approached, or received
19 threats, or been the subject of any particular
20 actions against you or your family that you want us
21 to be aware of?
22 A Yes.

1 Q All right. And can you explain what those
2 are?
3 A So the threats have come from the
4 directorate of Serbia's intelligence, and from
5 Kosovo, which has been anonymous.
6 And I have witnesses, five or six
7 persons, some of them lawyers in Germany; so, one
8 lawyer from Germany, two from Spain, and two
9 individuals from Kosovo.
10 Q All right. And this is a matter for
11 specialists within our office, so I'm not going to
12 pretend to be in a position to pursue this in the
13 way that they might.
14 But let me ask you, if you can explain
15 generally how those threats were conveyed, and what
16 they were?
17 A I want to explain from the beginning how
18 this started, if you allow me.
19 Q Well, I'm afraid that will probably not
20 be the most efficient way of doing it.
21 There may be a point at which we want to
22 get back to the beginning to better understand it,

1 but let's try it a piece at a time.
2 And the first thing I think I need to
3 know is, what were the threats, and how were they
4 transmitted to you?
5 A Okay. So, first of all, there have been
6 threats on the life from Kosovo.
7 And also, I received threats from the
8 deputy of the security of the intelligence BIA, the
9 Serbian Bojan Dimic, who threatened to me that, you
10 will come to Serbia, we will extradite you to
11 Serbia, and we will talk about the betrayal that
12 you've done, or carried out.
13 Q All right. You said there were threats on
14 your life that came from Kosovo; was that one
15 occasion, or more than one occasion?
16 A It was on two occasions.
17 Q And how was that communicated to you?
18 A It was via phone, telephone.
19 Q All right.
20 A And can I tell you who gave my number to
21 them?
22 Q Yes.

1 A It was a CIA agent, and the same person
2 gave this number to Serbia. And about in a year, a
3 year and a-half, a girl forced me to record my
4 conversations.
5 Q And how did you find out that this person
6 had given your number to the people who threatened
7 your life on two occasions from Kosovo?
8 A This person who was told that would have
9 mentioned this person, this CIA guy.
10 Q So the people who called you to threaten
11 your life, mentioned the CIA agent?
12 A So this person, this agent, he asked me
13 to record the talk with Bojan Dimic, and I gave
14 this recording to this person. And this recording
15 is sent to BIA, so the circle is very, very close.
16 Q Let me see if I understand this. A year
17 and a-half earlier, this CIA agent knew you were
18 going to be speaking with Bojan Dimic, and asked
19 you to record that conversation?
20 A He instructed me to have this
21 conversation with him and record it.
22 Because, as far as I know, since

1 February, 2020, I worked for the CIA, so I have
2 contracts, written contracts with this person.
3 Q And --
4 A -- it is not professionally that I'm
5 just classifying this information, but I don't see
6 any other way but to declassify this.
7 Q Okay. And what is the nature of the
8 contractual arrangement that you have; I mean, just
9 a normal contractual arrangement?
10 A So, according to this CIA guy, it is a --
11 he said he is an analyst, he is coordinator of the
12 area of -- including Russia and Europe.
13 And also, he is coordinator into getting
14 information about the crimes committed in Kosovo
15 and the Balkans.
16 Q And did I understand correctly that,
17 since February, 2020, you not only were working for
18 the CIA, but working in a kind of normal capacity
19 with some kind of contractual agreement?
20 A I've never done this before, but I
21 considered it an honor to help the United States,
22 because they've helped us a lot. So I considered it

1 an honor.
2 Q Okay. And do I understand correctly that
3 now your concern is that the information about some
4 of your work for the CIA has gotten to people who
5 are not happy with it, and are now threatening you?
6 A So, this person has declassified me. And
7 I wanted to say that, although I was for nine
8 months in Spain in prison, and I never declassified
9 the name of this person, so this is insured.
10 Q And I take it you -- the nine months in
11 prison in Spain was between October 1st, 2020, and
12 now?
13 A So it was 15th of December, 2020, to 16th
14 of September, 2021. So all this time, I did not say
15 anything about working for CIA, although I suffered
16 the prison term.
17 But now it is him still working for
18 (unintelligible), or him in Kosovo. But now it is
19 him that is declassifying my name.
20 Q And although it's not the most important
21 aspect of our conversation, can I ask you if the
22 nine months in prison was a sentence for something

1 you were convicted of, or a period of time you
2 spent in custody while a case was pending?
3 A It was detention, and they released me on
4 bail to defend myself in freedom.
5 Q So, what was the nature of the charges
6 for which you were held in detention?
7 A Extortion. So, it was extortion against a
8 Russian person, and also, they were claiming that
9 my lifestyle is a little bit luxurious, claiming
10 that I was -- [Witness states in English, "money
11 laundering."] -- laundering money, but I have all
12 papers in order.
13 Q Okay. And is that case resolved, or
14 charges are still pending?
15 A So, yeah, the charges are pending, so I'm
16 waiting for trial. It might take a year, two years,
17 five years, I don't know.
18 Q Okay.
19 A And I never thought about mentioning CIA,
20 declassifying it, even if I stayed in prison for
21 ten years, but this person is declassifying me.
22 Q Back to the two threats on your life in

1 Kosovo.
2 What was it that the people on the other
3 end of the phone said to you, to threaten you, and
4 did they explain -- tell me what they said, tell me
5 how they threatened you?
6 A So, the CIA agent told me that there are
7 problems with the witnesses, with the witnesses
8 against the people who are now in custody in The
9 Hague.
10 Yeah, so he said that I should contact
11 the Russian father's family, in order to give --
12 find money in order to pay the witnesses, because
13 their [Witness states in English, "black
14 accounts."] are running out of money, and we need
15 to get some money.
16 And he said that I've spoken with Jack
17 Smith, and it's okay; but did he talk with any of
18 the family members? This is a long story.
19 UNIDENTIFIED FEMALE: You need to
20 (unintelligible).
21 MR. TIEGER: (Unintelligible).
22 THE INTERPRETER: No, I can't, because he

1 needs to finish the sentence.
2 THE INTERVIEWEE: Sorry, sorry, it's my
3 fault. (In English)
4 (Unintelligible exchange between
5 interpreters.)
6 THE INTERPRETER: Okay. If you'll allow
7 me, I'll fill him in. I can't make sense of what
8 he's saying if I stop him in the middle of a
9 sentence, so I have to wait to make sense.
10 UNIDENTIFIED FEMALE: Can you manage then
11 to...
12 (Interviewee continues answering.)
13 THE INTERPRETER: Okay. So I didn't do
14 that, get money.
15 But this CIA guy, he has leaked that
16 allegedly it was me who has made the statement, and
17 my statement is the one that is keeping these guys
18 in prison; so it's only my statement that is
19 keeping them inside.
20 BY MR. TIEGER:
21 Q All right. And back to the two phone
22 calls you received from people who threatened you,

1 what did they tell you on those phone calls?
2 A So they asked me, what is your connection
3 with Kosovo? So he asked me, so, what is your
4 connection with Kosovo?
5 Because, for the past 30 years, I've had
6 nothing to do with Kosovo; I didn't take part in
7 the war, I didn't --
8 (Unintelligible exchange between
9 interpreters.)
10 UNIDENTIFIED FEMALE: The question he
11 asked me, Halit, what is your connection with
12 Kosovo, and he is now saying what he responded.
13 THE INTERPRETER: And he is saying --
14 yeah.
15 UNIDENTIFIED FEMALE: Okay.
16 THE INTERVIEWEE: Correct. (In English)
17 THE INTERPRETER: So I didn't -- yeah, I
18 was not involved in the war, in politics.
19 And as I told Mr. David Harbach, and Mr.
20 Harbach made me the same (inaudible). He said that
21 we know that you have no connections with Kosovo,
22 so where did you get all the information that

1 you're bringing here?
2 So the Kosovar are saying, so why are you
3 betraying, committing this betrayal; are you being
4 paid by Serbia, or are you being paid by Russia? So
5 this is in a nutshell.
6 BY MR. TIEGER:
7 Q Okay. And so that is what happened during
8 the two calls from Kosovo, that you wanted to bring
9 to our attention.
10 Tell us about the threat you received
11 from Bojan Dimic; when was that, how was that
12 communicated to you, what was said?
13 A So this CIA guy, he asked me to talk to
14 him, and to make very hard questions.
15 (Pause)
16 THE INTERVIEWEE: Okay. I am here. (In
17 English)
18 BY MR. TIEGER:
19 Q Okay. No problem. Thank you. One thing,
20 if I can ask you, as much as possible to speak in
21 brief intervals, and allow a translation
22 frequently; it makes it much clearer.

1 A Okay. (Through the Interpreter)
2 Q So I understood from what you explained
3 earlier, that there were communications, both from
4 Kosovo and from Serbia, that you were concerned
5 about; you just talked about the calls from Kosovo.
6 And I understood there was a threat from
7 Bojan Dimic that you'll be extradited, and I just
8 wanted to hear more specifically from you how this
9 threat or concerning phone call -- or concerning
10 communication took place;
11 Was it face-to-face, was it a phone call,
12 was it in a text message, and more concretely what
13 it was?
14 A So it was through a phone call.
15 Q Okay. Do you -- how did the person who
16 contacted you -- or, did the person who contacted
17 you identify himself, or indicate who he was, or
18 who he was calling on behalf of?
19 A Okay. So I -- with this CIA agent, I was
20 in Belgrade, and we met with Bojan Dimic. We had
21 lunch with him, so we exchanged our phone numbers.
22 We also met this Milan Radoicic, who was

1 a senior official in the gendarmerie, the Serbian
2 gendarmerie.
3 Q When was that?
4 A 2020. I have a question, are you sure
5
6 that I made the statement to you on the 1st of
7 October?
8 Q Yes, I am. October -- I'm reading from
9 the transcript; the date is October 1st, 2020.
10 A Okay. Thank you, thank you.
11 Q Okay. I think you were explaining to me
12 the backdrop, or some of the factors that you feel
13 led to the threat.
14 I was trying to get from you the timing
15 and nature of the communication that you -- that
16 prompted you to call Mr. Bennett, and that I was
17 asking you about earlier?
18 A So I wanted to say, all the testimony
19 which I gave in The Hague to you, I was prepared by
20 the CIA agent.
21 Q All right. I asked you at the beginning
22 of this phone call about the communication you had

1 with Mr. Bennett, and about my understanding that
2 you had contacted him to say that you wanted to
3 retract that information, and didn't stand by it,
4 and you said absolutely not.
5 And now you're telling me that that was
6 information that you were -- that was prepared for
7 you, or that you were prepared by the CIA agent.
8 So, was the information -- do you stand
9 by the information or not; was it your information,
10 and was it accurate or not, according to you?
11 A So probably we are misunderstanding each
12 other, or the reason I called is misunderstood. But
13 I want to say that these recent developments are a
14 cause for concern for me.
15 So, before I came to SPO, this CIA agent
16 told me that Jack Smith knows about this, and all
17 this information I gave was because they didn't
18 have -- you didn't have enough evidence to imprison
19 these people, so the CIA helped with that.
20 Q When you were here, sir, you explained to
21 us that you had -- that you were a hundred percent
22 sure about this information, and it had been given

1 to you -- I believe you said by trusted sources.
2 Do you stand by that, or do you say that
3 you were just told to say it by your CIA person?
4 A So I believe that this CIA person is very
5 trustful, because, if I didn't think he was
6 trustful, I wouldn't say this, and I wouldn't give
7 that information.
8 Q And did the information you gave in
9 October of 2020, come from a number of different
10 sources, or only from this CIA person?
11 A Only from the CIA, sir, only from the CIA
12 agent. (In English)
13 Q I'm going to go back to something else
14 you said, that I didn't quite understand, before we
15 go on.
16 A Yes. (Through the Interpreter)
17 Q You said something about the CIA agent
18 telling you to contact Hashim Thaci's family to get
19 money to pay witnesses for black accounts?
20 A CIA, yes, the CIA told me that. Yes, the
21 CIA told me that, the CIA agent.
22 Q Okay. So these -- do I understand

1 correctly, that you understood that these were
2 people who were to be paid money provided by Hashim
3 Thaci's family, in order not to provide evidence
4 against Hashim Thaci?
5 A So this money that I was asked to get, to
6 generate for this [Witness states in English,
7 "black account."], the idea was that the money in
8 the [Witness states in English, "black account."]
9 should be paid for these people, should be used to
10 pay these people.
11 And The Hague has had about eight hundred
12 million in expenses, and so this money were running
13 out.
14 So, me, as a secret agent, should try to
15 gather, to collect money in order to cover these
16 expenses, because things are running out, and the
17 people might be released because they don't have
18 facts to keep them in.
19 Q Wait, wait, wait. Don't just -- who
20 are -- who do you say these witnesses are, you were
21 asked to get money for?
22 A I don't have any idea.

1 Q But in any event, you were told that
2 Hashim Thaci's family might be willing, or might be
3 the appropriate source to provide money for that
4 purpose?
5 A It just asked them, Hashim Thaci's
6 family, and other people's families of those who
7 are in prison. Yes.
8 Q Okay. So am I correct that you were asked
9 to approach these family members and tell them what
10 you wanted the money for, in order to benefit
11 members of their family who are in prison?
12 A So, in order for the money to go into
13 this [Witness states in English, "black account."]
14 for any expenses; prosecutors or anything that
15 happens today.
16 Q The money was supposed -- you were
17 going to Hashim Thaci's family, or the family of
18 other people who were in prison, right, do I have
19 that part correct?
20 A Yes.
21 Q Okay. And you would tell them that you
22 needed money to replenish black accounts that were

1 low, in order to help that member of their family
2 who was in prison, is that correct?
3 A Correct. (In English)
4 Q All right. And I understood that you
5 declined or refused to do so?
6 A Yes, no way. (Through the Interpreter)
7 Q All right. With respect to the threats
8 currently against you, have they --
9 I understood that, in the phone calls,
10 people expressed some awareness that you were
11 providing information, and wondered where it -- you
12 know, how you knew -- and I didn't quite understand
13 what the nature of the threat, or the concern was
14 from Serbia.
15 But I wanted to know if there's any
16 concrete specific threat at the moment that you're
17 facing, or if you're expressing to us general
18 concerns about what people know, that might result
19 in concrete threats, or concrete actions?
20 A Yes, I understood what you said, yes. So,
21 what this analyst, this CIA person, the information
22 he's given me, I've used it in a way --

1 (Discussion between interpreter and
2 interviewee.)
3 Okay. So, since the time I had
4 disagreement, contract with this CIA person, I'm
5 being used in a very dangerous way by this person.
6 Because, concerning those statements I've
7 given to The Hague, because I thought, with those
8 statements I've given to The Hague, that I was
9 helping somehow the CIA, and also the SPO.
10 But because this CIA person is
11 declassifying me, and is putting my life in danger
12 with no apparent reason, and now I want to
13 declassify everything.
14 And as far as my preparations for the
15 statement in The Hague, as far as I understood, Mr.
16 Jack Smith was aware of that.
17 So I understood that I was kind of
18 programmed and prepared to convey this information
19 as I was prepared by this CIA agent.
20 And I have proof that all this documents
21 that were leaked and declassified from Belgrade, in
22 relation with Kosovo Specialist Chambers, behind

1 this is this person, this CIA person. And he has
2 made me in July to the specialist in
3 (unintelligible).
4 And then he, the CIA guy, always let me
5 understand that Mr. Jack Smith knew about this, and
6 he several times has passed him on the phone.
7 I don't know Jack Smith, but he --
8 purportedly, I was speaking to him on the phone,
9 which was passed by this CIA guy to me.
10 Q Okay. Got it. So you wanted -- your
11 purpose in calling Chris Bennett, and in explaining
12 this to us, is to declassify;
13 That is, to let us know about this CIA
14 agent and your relationship with him, because he
15 declassified you, and now you're declassifying him?
16 A So I always believed that I was helping,
17 assisting with the very grave crimes that have been
18 committed; that was my belief. And for me, it was a
19 pleasure to help the SPO and The Hague.
20 And I've always believed that American
21 intelligence services are working to gather
22 information to that end. That's what I have always

1 believed.
2 Q All right. Understood. All right. Well,
3 for now, that certainly completes -- we've gone a
4 long time already; it's an hour and 15 minutes, I
5 believe.
6 I understand that you conveyed to us the
7 information that you wanted to provide to Mr.
8 Bennett in that phone call, and thought you
9 provided it, or at least the information that was
10 in part the subject of that conversation.
11 A Yes.
12 Q Yes. Okay. So, only the last piece of
13 information that I think rounds out what you
14 provided before is, can you tell us the name of the
15 person you claim is a CIA agent?
16 A In the beginning, I thought his name was
17 Florian, and his [Witness states in English,
18 "nickname."] is Adidas.
19 And when we were in Belgrade, I was
20 driving the car, and he gave me his ID to pass it
21 on to the customs person, and the name there was
22 Faik Imeri.

1 And when we meet the first acquaintance
2 with him, he showed me a CIA ID document. He
3 covered the last name, but the name was Dorian.
4 Because in Belgium, where he send me, he
5 send me in [Witness states in English,
6 "safehouses."] And I am confident they were CIA
7 safehouses, where I signed contract with CIA.
8 Q Okay. All right. Can you hold on just one
9 second, please.
10 (Pause)
11 BY MR. TIEGER:
12 Q Okay. Just a couple of concluding
13 questions. How did you come into contact with this
14 CIA agent in the first place?
15 A He got in touch with me.
16 Q When was that?
17 A So, by middle of February, 2020.
18 Q And did he explain to you why he reached
19 out to you, instead of any number of other people?
20 A He (unintelligible) me because we've been
21 talking quite a lot, sometimes 20 times a day with
22 him, and I believed him. And I still believe, even

1 now, that he is a CIA person.
2 Q But when he initially contacted you, did
3 he explain why he reached out to you?
4 A So, in Kosovo, like, the media intrigues
5 going around, they were saying that I was allegedly
6 a Russian spy.
7 And so this person, he said that all this
8 are FBI, CIA, or NSA. They wanted to get in touch
9 with me, only to get money out.
10 So the reason he contact me was that the
11 Kosovo people, they ask CIA whether Halit Sahitaj
12 was a Russian spy.
13 And he said no. But he understood that
14 there were media intrigues, and they were wrongly
15 accusing me of that. And he just met me just to
16 help me, in order not to slash me out of my money.
17 Q Okay. All right. Sir, as I indicated a
18 bit earlier, I understand from you what it was that
19 prompted --
20 Or, at least I understand, according to
21 you, what it was that prompted your conversation
22 with Mr. Bennett, which was the purpose of the

1 call, as I said, to clarify and understand that
2 conversation.
3 And as I now understand it, you were
4 responding to the fact that you had been
5 declassified, and then wanted to respond by
6 declassifying the CIA agent.
7 A Because he sent information in Kosovo
8 that allegedly I've given an untruth, so my
9 statement was untrue.
10 Q So the last question I have is, when did
11 you receive the two phone calls from Kosovo?
12 A About a week ago.
13 Q And when did you have the contact from
14 Dimic, the contact from Serbia?
15 A More or less ten days ago, so they were
16 parallel.
17 Q And was that also a phone call?
18 A Yes, it was a phone call; from the
19 conversation with Dimic, I have proof of that, of
20 the conversation.
21 Q What kind of proof?
22 A I have his calls, as registered.

1 Q Okay. You have a register of the phone
2 call?
3 A I have a [Witness states in English,
4 "screen shot."] of his calls, and his SMS.
5 Q You have a screen -- did you take screen
6 shots of the two calls from Kosovo?
7 A I have the numbers, yes.
8 Q Okay. Can you send those? We'll give you
9 a number to send those on.
10 A Of course.
11 Q Okay. So all screen shots, SMSs.
12 A Okay. (In English)
13 Q Okay. All right, sir. So, once we have
14 that in hand, we can review it in the context of
15 the information you've provided us.
16 MR. TIEGER: Okay. So we'll look forward
17 to getting those. I appreciate the time you've
18 spent with us today. And unless there's anything
19 else...
20 THE INTERVIEWEE: In the end, I want to
21 say something to Mr. Alan.
22 MR. TIEGER: Is that in connection with

1 the narrow issue we've been discussing, which is
2 the phone call to Mr. Bennett, and the information
3 you provided him?
4 THE INTERVIEWEE: Yes. I'll be ready to
5 help, assist the SPO with anything. But please
6 don't treat me like the CIA agent, together with
7 Jack Smith, treated me.
8 Because every time he would -- the CIA
9 agent, when he would talk to me, and he will say
10 that he is conveying to me messages by Jack Smith,
11 and allegedly Jack Smith has told him, and he
12 showed me the screen shot.
13 [Witness states in English, "No, he sent
14 to me the screen shot from Jack Smith."]
15 (Interrupting)
16 THE INTERPRETER: Oh, he sent. Yeah, he
17 sent the screen shots he had of the phone calls
18 with Jack Smith.
19 MR. TIEGER: Okay. Well, then, thank you
20 for the information, sir.
21 THE INTERVIEWEE: Sir, ma'am, have a nice
22 day. Thank you very much. (In English)

1 (Whereupon, at approximately 5:40 p.m., the
2 interview was concluded.)
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CERTIFICATE OF TRANSCRIBER

I, Loretta A. McManus, a certified legal transcriptionist, do hereby certify that the foregoing pages are a true and accurate transcription of the captioned interview, produced by me to the best of my knowledge and ability from an attorney-provided audio recording dated April 22, 2022;

That any inaudible or unintelligible audio segments are parenthetically indicated within the body of the transcript; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this interview took place; and, further, that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of this action.

Loretta A. McManus

Loretta A. McManus
Certified Legal Transcriptionist

EXHIBIT F

1:19 PM

EXHIBIT G

EXHIBIT H

Ducka was racketeering business people using FBI guy (threatening sanctions)

They had [illegible] papers [illegible] FBI [illegible] and they just changed the [illegible] in the [illegible] used them to show the people that [illegible] were about to be black listed by US and if they paid, it can be stopped

what does this mean clearly? the fbi guy was blackmailing them with original files putting their names?

FBI guy had access to original files [illegible] to black list Russians by US. They took those and changed the names to Albanian 😂😂😂

Wild f[illegible]

Duçka po shantazhonte njerëzit duke perdorur djalin e FBI-se (sanksione kërcënuese)

Ata kishin letra origjinale nga djali i FBI-se dhe thjesht ndryshuan emrat dhe i perdoren per tu treguar njerëzve se do te futeshin ne listen e zeze nga SHBA dhe nese paguanin, mund te ndalohin

çfare do te thote kjo? Djali i fbi po i shantazhonte me dosjet origjinale duke i vendosur emrat e tyre?

Djali i FBI-se kishte access ne dosjet origjinale te perdorura ne listen e zeze te rusëve nga SHBA I moren ato dhe i zevendesuan emrat me te shqiptareve

E eger e

LOL 😂

New twist on FBI guy's MO in Tirana... his "partners" had papers that looked legit (FBI logo etc) [illegible] "businessmen" [illegible] who could be suspected of doing things that could get them blacklisted by US. They would then offer a meeting with FBI guy (usually in Vienna) in which scared businessmen would be encouraged to pay the partners (1-5 million €) in order for the "process of black listing to be reversed"

Shiko!

Nje kthese e re ne axhenden e djaloshit te FBI-se ne Tirane

partnerët e tij kishin letra qe dukeshin te ligjshme

(logoja e FBI-se etj.) qe do t'us prezantonin "biznesmenëve"

nepër qytet, te cilët dyshoheshin se benin

gjera që mund t'i çonin ne listen e zeze

te SHBA-se. Me pas ata do te ofronin

nje takim me djalin e FBI-se (zakonisht ne Vjenë)

ne te cilin biznesmenët e frikesuar do te inkurajoheshin

te paguanin partnerët (1-5 milionë €)

ne mënyre qe procesi i listave te zeza te kthehej mbrapsht

EXHIBIT I

9 Michael
online

Agron B
+1 (201) 270-8533

audio video search

17 May 2022

Media, Links, and Docs None >

Starred Messages None >

Mute 2:19 PM

Agron Neza 2:19 PM

I texted him there several times and went to his home but did not reach him. 2:21 PM

he hasn't responded 2:21 PM

7 Feb 2023

Hi Milaim 12:38 PM

David Schwendiman remembers you, but he doesn't recall Faik Ymeri. Is there something I

9 Michael
online

Hi 12:39 PM

You can ask Shwedeman why Milaimi came to him? What was the purpose of coming? Faik told me that he was Shwedemen's assistant, as an employee of the American CIA, and he visited Belgrade twice with him.

12:44 PM

Faik Imeri said that he works in the Prosecutor's Office of the Special Court in The Hague. He has also stated that he also works as an investigator. All files, according to Faik Imer, pass through his hands. Faik Imeri has shown me top secret files, as well as witness statements. He showed me part of the testimony of President Thaçi. He sent me via sms, in the form of a photo. He also talked to me about Carls Mgconigen, who told me that through him there is access to the FBI database.

12:53 PM

the FBI database. 12:53 PM

Okay I'll ask him. Did you discuss Faik with Schwendiman? 12:55 PM

I am very convinced that Faik Imeri was paid in advance for the information he received from the FBI agent, then he sold them at a high price, and blackmailed them. Faik Imeri is called on behalf of David, Jack Smith and MaConigen-FBI 12:58 PM

Ok 12:58 PM

Faik Imeri always talked to me about David, and stated that he is a close friend. I did not believe him, but there are many who believed him. I have been a journalist for 40 years, but I have never met a more manipulative, deceitful, forger. For example, he told us to several people that he participated in the killing of Bin Laden, in the arrest of Milosevic, and many other stories.

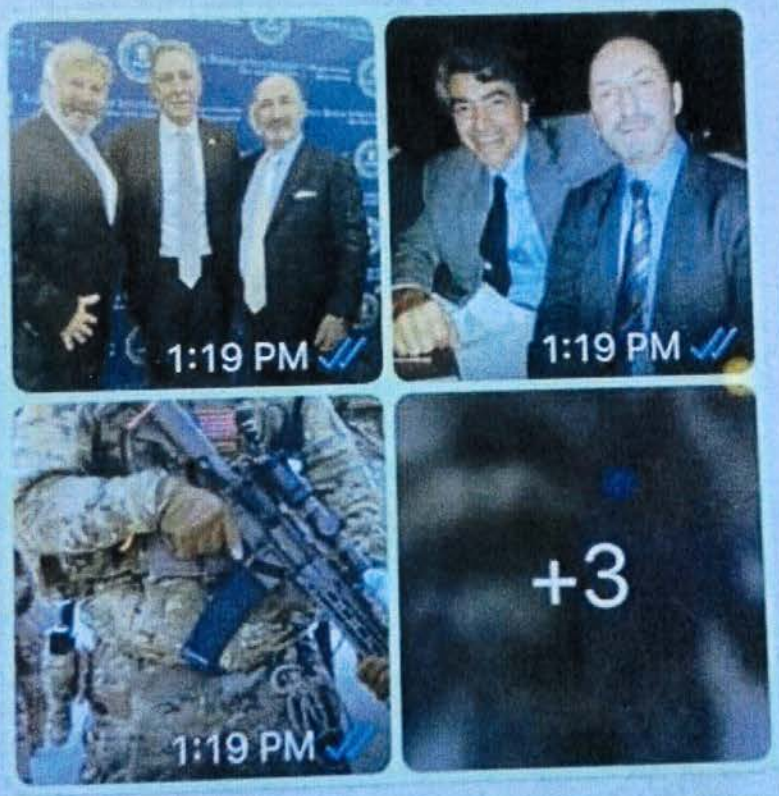
1:04 PM

I am convinced that the money used by Agron Neza has its source in Serbian and Russian money, with which Faik Imeri is paid.

1:07 PM

Okay, thanks, will talk to Schwendiman about this.

1:17 PM



I don't know who all those people are except McGonigal

1:20 PM

You

Photo

EXHIBIT J

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12:00

Tja bojna dichish

Ose mire chishm ki thon

Ose liroma

Se nall jm

Kuptom

Jemi shiptar

Ti me mu takohesh vetem me ate Halitin

Edhe po te lutem sikur njeri mos u merr ma me kete pune

Cka te duket se tu ka ba padrejte, drejtoju Gjykates

Po ti aje n pisedim o z zeka

Ta krim punn

Kam pranu si njeri me pi kate me ty, pastaj ma ke dredhe tu me shantazhu

Search

74°F
Sunny

Esc
FnLock

_1081.jpg

71%

12:01

IA

Kaq

Un ti kur nuk tkm shntazhu

Lidhje me shpi nuk kam

As skm pas asi mendimi

Fol me pronarin e shtepise, Nexhmedin Sfarqen

Po amki afru 300 mi e edhe diskotkn

Ta xhejna ni mes

O burr se nall km ra

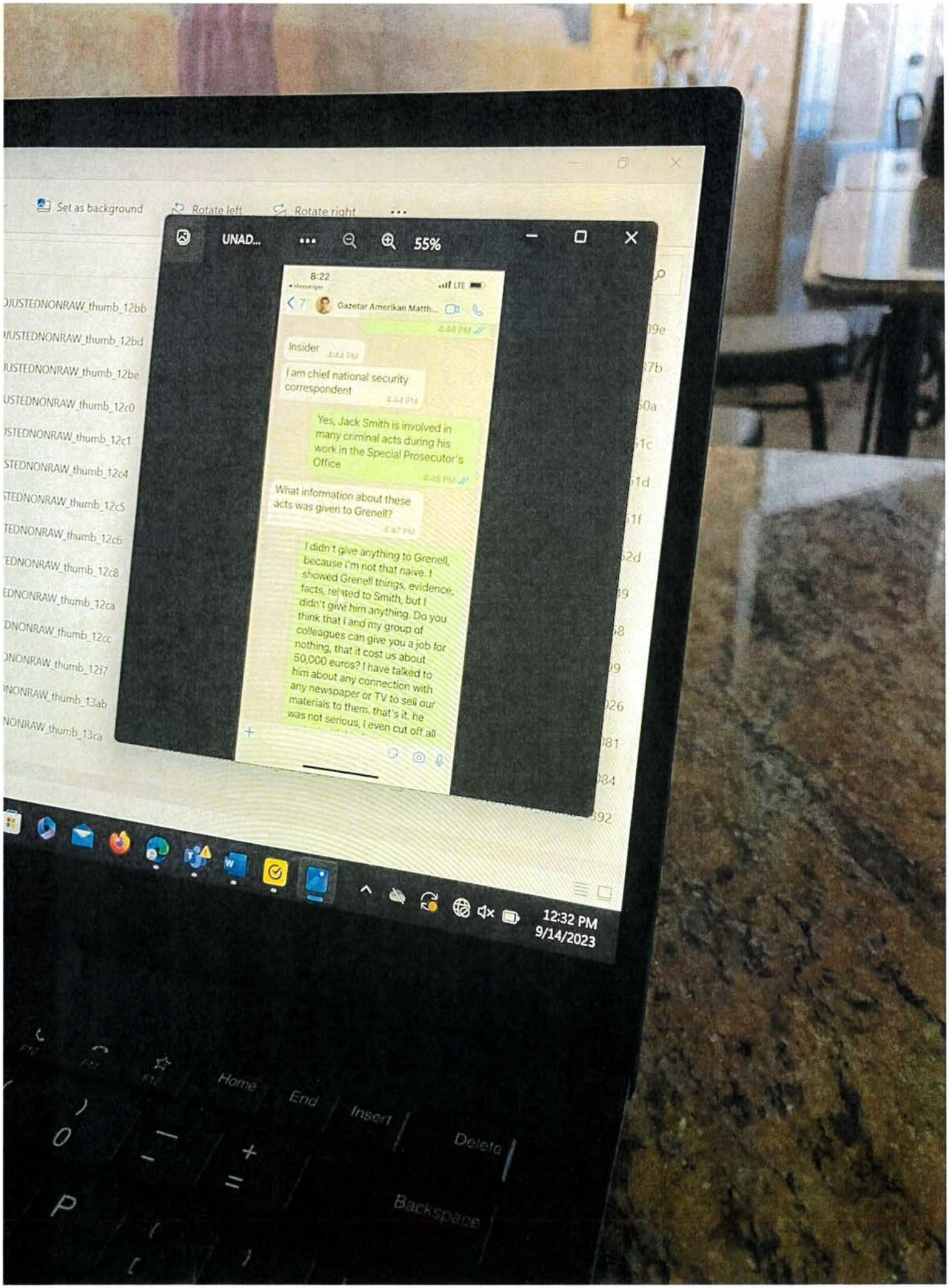
Ilir, kaq

Kuptom

Ti me ke thane qe une ja kam Halitit 100 mi borgj

Po

Search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8:22
Gazetar Amerikan Matth...
Insider
I am chief national security correspondent
Yes, Jack Smith is involved in many criminal acts during his work in the Special Prosecutor's Office
What information about these acts was given to Grenell?
I didn't give anything to Grenell, because I'm not that naive. I showed Grenell things, evidence, facts, related to Smith, but I didn't give him anything. Do you think that I and my group of colleagues can give you a job for nothing, that it cost us about 50,000 euros? I have talked to him about any connection with any newspaper or TV to sell our materials to them. that's it. he was not serious, I even cut off all
12:32 PM
9/14/2023

EXHIBIT K

SALI MUSTAFA

DOSIA „MASARI"
NOPRA E SALIS
ASHT „MASARI"

PARA DISA DITESH
ISHA EM. BG

U TAKOVA DISA MIR
TE VJETER
TE CILËT MË TREGUAN
PËR AKTIVITETET E
CALIT NË VITET 90

MË TREGUAN SE BIA
E KA DOSJEN E CALIT
SI INFORMANT
I UDHËSNËAT
KDH

NE DOSJEN PERFSHIRE
AKTIVITETI E BASHK
PUNIM ME UDBEN
PREJ 1989 DERI 2003
KUR AUTOBUSI
NISH EXPRES ASHT
SULMUAR

KUR CALI I KA LAJM
E PRORI E VET NE BG

CALI I KA PAS DY
EPROR TE VET
NJERI PREJ VRANJEVC
DHE TJETRI PREJ
NISHIT SERB

NE DOSJET E
CALIT JAN
TE GJITHA PAGESAT
TE DESHMOJN PER
BASHKPUNIM ME
UDBEN E ASHAJKOHE
KETO DOSJE I
POSEDON BIA.

SIPAS INFORMATAVE
QE I KAM
NESE JU JAU
KERKOHI.
ATA DO TJAU
JAPJA
SE TASH JU
NEVOJITEN PER
MEMOT EJUVE

DOS. MILOVAN
DRECUN.
I ULA PSHT
SHEF I KOMISIONIT
PARLAMENTAR
KRIME LUFTE SERBI

KY KAPAS QASJE
NE KTO DOSJE
TE ULAT JA KOMPL
CTUN DROKARTI
E SERBIS

M. DRECUN
BAN TREGTI ME
KTO DORU.
QE NJE VIT

ME NJEKËT SHKËMBI
TË QRS.
ELMI REQICA
H. TH. R. V

FLET ARRESTTOSU

NË DIUNI PËR
RRDHJEDHJE E
KTYNË DOK.- ASHT
EDHE PERSONA
MBEDDA (BIA)
SIPAS BURIMIT TIM

ASHT MERENDESI
TE CEKET
SE ME PUBLIKIMI
E DOSJEVE TE HAAGES

DISKREDITOHET
GJYKATA SPEC.

GODITEN DESHMITARI
QE MUNDTA SJELL
GJ. SPEC.
PARA NJI AKTI TE
KRYER DREJT
EHBAMJES

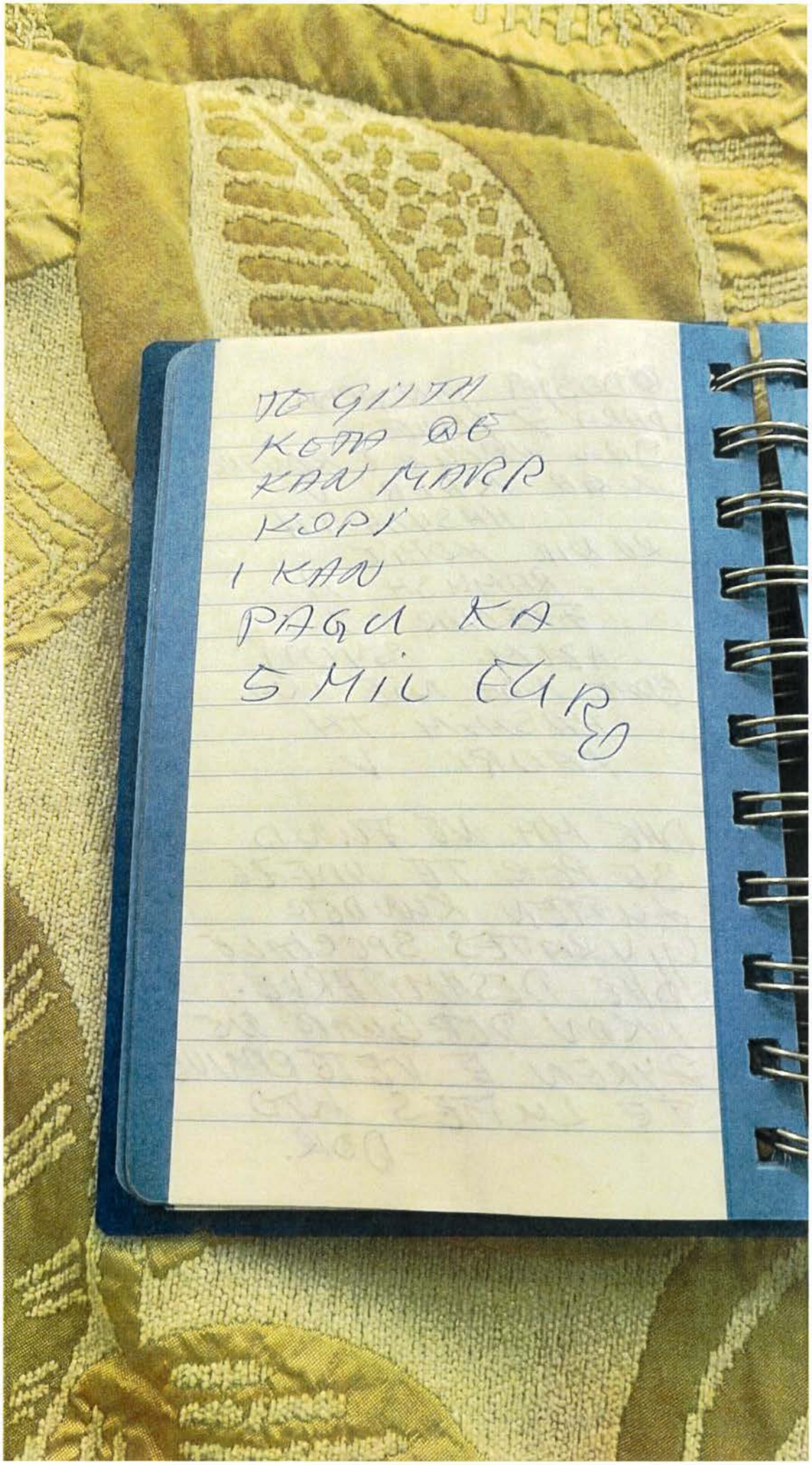
DHE SIPAS KTI
SKENARI,
MARRVESHJET
E. H. TH E VUQIQ
DO TE REALISOHEN
DTHAQ 'I TO TJERET
DO TE AMNISTOHESHIN
DHE PO ASHTU
ATA QE KAN KRY
KRIME NE
KS. DO TE AMNISTOHEN
KJO DKIA QE MARRU
E. H. EDHE. VUQIQ

DOSJET KANE ARDH
NGA SRBIA.
PER NJE LIDHJE NE
MES ELMI REQICES DHE
MILOVAN DRECUNI
KA NJOHURI EDHE RADA
TRAJKOVIC.
TAKIMI I TYRE ASHT
ZHVILLUE NE GJILAN
DHE SHKUP NE SHKURT
2020.
TEMA KA QENE DOSJET
DHE KOMUNIKIMET
PROKURORIT SPECIAL ME
PROKURORET SERB NE
LIDHJE PER KRIME LUFT.
PJES E KETI PAGARI KA
QENE EDHE HEQJA E
FLETARR. PER MILLAN
RADOJCIC E ZVONKO
VESELINOVIC.

NE KETO DOK. JAN
TE INVOLVUAR
BRUNO VEXHARIC
ANDREA VUCIC
MILAN RADOJCIC
ZVONKO VESELINOVIC
NGA PALA SERBE
NDERSA NGA PALA
SHQIPT. JAN
ELMI REQICA ✓
KADRI VESELI ✓
HASHIM THAQI ✓
BLERIM DEVOLLI
KY I FUNDIT I KA
PAGUAR 10 MIL EURO
NE MONTENEGRO
DPAERT I KA MARR
ZVONKO NE AMJOK BT
NE MONTENEGRO

DOSJE JAN ARDH
PARA 5 JAVE
JAN HAPUR E KONTROLL
AGA KADRI V
HASHIM TH
KANIE KOPIT
RAMUSH H
FATMIR L.
AZEM SYLAJ
EDHE NGA NJE IKA
HASHIM TH
KADRI V.

DHE MA NE FUND
SE PER TE NDEZE
LUFTEN KUNDER
GJYKATES SPECIALE
DHE DESHMITARVE.
I KAN DERGUAR NE
ZYREN E VETERANVE
TE LUFTES KTO
DOK.


DE GINTH
KOTA QE
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5 MIL EURO

ATA QE KAN
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DRAGOLUB
STAVKOVIC

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KIMIE LUTTU

MILOVAN
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TANA PALT.
JAN TE BINDU
SE KY 100%